
Solihull Draft Local Plan Supplementary Consultation

Land east of Coleshill Heath Road

Representations on Behalf of St Philips Ltd

March 2019

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1. Introduction

- 1.1 These representations have been prepared by Avison Young on behalf of our clients St Philips Ltd (referred to as St Philips) in relation to the Solihull MBC Local Plan Review Non-Statutory Consultation *“Reviewing the Plan for Solihull’s Future: Solihull Local Plan Review: Draft Local Plan Supplementary Consultation”*.
- 1.2 St Philips has an interest in land east of Coleshill Heath Road, and adjacent to Birmingham Business Park, which is referred to as Site 131 in the Solihull Local Plan Review ‘Site Assessment’ documentation. A site plan is appended to these representations at **Appendix I**.
- 1.3 St Philips is promoting the allocation of the land for the delivery of up to 135 dwellings within the first five years of the new Local Plan period. The opportunities and design principles for the proposed development are considered in the Vision Document which is submitted alongside these representations (**Appendix II**) and which is informed by a suite of technical evidence to demonstrate that the site is deliverable.
- 1.4 The site has been promoted through the latest Call for Sites consultation exercise, and its development potential has been considered within the Strategic Housing & Economic Land Availability Assessment (2016), and in the subsequent Sustainability Appraisals undertaken by the Council.
- 1.5 The extant development plan for Solihull MBC comprises the Solihull Local Plan, which was adopted in December 2013 and covers the period 2011 to 2028. Following the adoption of the Plan a legal challenge resulted in the housing requirement being deleted and remitted back to the Council for reconsideration.
- 1.6 As a result of the above the Council has reviewed the housing policies within the Solihull Local Plan. In this context they undertook a ‘Scope, Issues and Options Consultation’ on the Local Plan Review between November 2015 and January 2016, which was followed by a Draft Local Plan Consultation between December 2016 and February 2017.
- 1.7 The purpose of the current Supplementary Consultation is to:-
- provide an update on Local Housing Need following the introduction into the NPPF of the Standard Methodology, and following the Technical Consultation on updates to planning policy and guidance (October 2018) which led to the publication of the NPPF (2019);
 - assess the 70+ additional Call for Sites submission that Solihull MBC has received following the publication of the Draft Local Plan in 2016;
 - refine the site selection process for assessing which sites should be included in the plan and reassess all sites (circa. 430) to ensure that the preferred sites are the most appropriate when considered against the spatial strategy, and existing/new or updated evidence; and
 - publish the concept masterplans for principal allocations.
- 1.8 As set out in the following representations, St Philips concludes that, if the Council proceeds to publish the Submission version of the Local Plan without change to the housing policies and proposals as they are set out in the Supplementary Consultation document, the subsequent Examination will find the Draft Plan to be unsound. St Philips considers that the land at Coleshill Heath Road should be allocated for development as part of a package of amendments needed to ensure compliance with national policy requirements.
- 1.9 It should be noted that these representations respond to those questions raised through the Draft Local Plan Supplementary Consultation that are considered relevant to the proposed development site in question.

2. St Philips' response to the Supplementary Consultation

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?

- 2.1 The NPPF (February 2019) confirms at Paragraph 60 that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflect current and future demographic trends and market signals."*
- 2.2 This is supplemented by Planning Practice Guidance: Housing and Economic Needs Assessment which confirms that the Standard Method *"uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply"* (Paragraph: 002 Reference ID: 2a-002-20190220).
- 2.3 Government consulted on a number of potential changes to the Standard Method following the publication of the 2016 Household Projections. As a result of the consultation government has confirmed that the use of the 2014 Household Projections is the most appropriate approach for the time being. It has also confirmed that the Standard Method does not represent a mandatory target for local authorities to plan for, but is to be treated as the starting point for the planning process.
- 2.4 Solihull MBC has applied the Standard Method, utilising the 2014 Household Projections, and has found its local housing need to be 767 dwelling per annum, equivalent to 13,039 dwellings across the Plan period (assuming that were to be confirmed as 2018-2035). This is the approach advocated by the NPPF (February 2019) and is accepted by St Philips.
- 2.5 Notwithstanding this, government has set out its intention to review the Standard Method within the next 18 months (i.e. by August 2020) with a view to establishing *"a new approach that balances the need for clarity, simplicity and transparency for local communities with the Government's aspirations for the housing market"*. This will need to be monitored as the preparation of the plan progresses as future changes to national policy may require further work to determine the minimum local housing need for the Borough.

Unmet Need

- 2.6 St Philips notes that the Council has maintained a reference to accommodating 2,000 dwellings within the Borough as a proportion of the unmet need that arises across the wider Housing Market Area (HMA). Adding this to the Local Housing Need figure arising from the application of the Standard Method increases the number of dwellings to be provided to 885 per annum, or 15,039 dwellings over the plan period.
- 2.7 St Philips acknowledges that the Council has said that *"the potential for this [i.e. a contribution of 2,000 dwellings] to be revised as part of the Submission Draft (to be published in summer 2019) remains"*. Whilst the Council is not seeking views on this matter as part of this consultation, St Philips does not consider that inclusion of an allowance of 2,000 dwellings to help address the HMA shortfall is sound.

- 2.8 As the Council itself acknowledges *"there is a clear expectation from other HMA authorities (and other interested parties) that (a) there is no clear justification why 2,000 was chosen as the figure Solihull would make towards the HMA shortfall and (b) there is opportunity to make greater provision"*.
- 2.9 The LPA must set out clearly the evidence that supports the adoption of 2,000 as the figure for 'unmet need' and should provide the opportunity for that to be scrutinised by all those with an interest in the Plan. It is assumed that the Greater Birmingham HMA Strategic Growth Study will be part of the Council's evidence base in this regard; in which case the Council will need to clearly set out the assumptions that it relies upon for determining the scale of unmet need across the HMA, and the basis on which it has concluded that it should accommodate 2,000 of the overall shortfall. When thoroughly assessed, the overall shortfall may increase, which may have a bearing on the Local Housing Need figure of 885 dwellings per annum that the Council has adopted for the purpose of this consultation. That would have implications for the amount of land to be allocated for housing, yet the strategy as set out in the Supplementary Consultation includes no flexibility to accommodate such an adjustment.
- 2.10 St Philips considers it prudent to note again that the NPPF (2019) and PPG confirm that the application of the Standard Method sets the *minimum* housing need to be included within a Local Plan.

Proposed Plan Timeframe and Need for Safeguarded Land

- 2.1 Paragraph 22 of the NPPF confirms that *"Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities"* (our emphasis).
- 2.2 St Philips notes that changes have been made to the duration of the plan period between the publication of the Draft Local Plan (Nov 2016) and the Supplementary Consultation (Feb 2019). The DLP covered the period from 2014-2033 (19 years) whereas the Supplementary Consultation refers to the period 2018-2035 (17 years). The Local Plan is unlikely to be adopted until 2020, so that the remaining plan period will be 15 years, in line with the guidance set out in national planning policy. Notwithstanding this, the plan period should be adjusted to 2036, which would also be consistent with the GL Hearn Strategic Growth Study. The SGS forms part of the Council's evidence base for the preparation of the Draft Local Plan and due consideration should therefore be given to the document. Should the Council wish to discount this evidence, sufficient justification to support an alternative approach should be provided.
- 2.3 It is recognised by all parties that Solihull MBC is required to release land from the green belt to meet its Housing Need. In this regard, paragraph 139 (c) of the NPPF (2019) advises that 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";*
- 2.4 This is a critical matter for the Solihull Local Plan given that the Borough is substantially constrained by green belt and that Paragraph 139 (e) of the NPPF says that plans should:-
- "be able to demonstrate that green belt boundaries will not need to be altered at the end of the plan period"*.
- 2.5 Despite this clear advice the Local Plan as currently drafted (albeit in a Supplementary Consultation document) does not include any areas of safeguarded land to accommodate longer term growth. Whilst the term *"well beyond"* the plan period is not be defined in the NPPF, and may be for debate having regard to local circumstances, it would be reasonable to conclude that this should be a minimum of five years, and more robustly ten years, particularly in an authority as constrained by green belt as Solihull.

- 2.6 Adopting the current annual Local Housing Need figure derived from the Standard Method would suggest a need for a substantial allocation of safeguarded land (3,835 to 7,670 dwellings over a five or ten year period, excluding any allowance for cross boundary need) in addition to the land required to meet any shortfall from the HMA. Setting the boundaries with confidence depends, of course, on clarity in relation to the proportion, and amount, of unmet HMA need to be accommodated in Solihull Metropolitan Borough.
- 2.7 The draft Local Plan considered in this context does not meet the objectives of the NPPF (2019) and, if it is to be found sound, should identify a supply of safeguarded land so as to secure green belt boundaries well beyond the plan period. Decisions on where that safeguarded land should be must be evidence-based and related to an assessment of the performance of land against green belt purposes.

Housing Land Supply Position

- 2.8 We have reviewed the Housing Land Supply table included at page 13 of the Supplementary Consultation document. As part of this we have been advised by Officers that further evidence supporting the Housing Land Supply Table is not yet available for scrutiny. It is understood that the Council will publish this evidence once the period for the Supplementary Consultation has been closed.
- 2.9 St Philips notes also that a Housing Delivery Trajectory has not been published, nor have sites been allocated into phases. It is assumed that this is as a consequence of on-going work on individual site masterplanning, but it is essential that this information be made available prior to the Submission of the plan.
- 2.10 Our comments on the Housing Supply Table in the Supplementary Consultation document are set out below.

Source	Estimated Capacity	Avison Young Comment
1. Sites with planning permission (started)	1,106	We assume that the figure of 1,106 is an accurate, factual position.
2. Sites with planning permission (not started)	2,199	<p>The NPPF confirms that <i>"to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."</i></p> <p>All sites which do not involve major development and have permission and all sites with detailed permission should be considered deliverable until permission expires unless there is clear evidence that they are no longer viable. Where a site has outline permission for major development, is allocated in the development plan, has a grant of permission in principle, or is identified on a brownfield register it should only be considered deliverable where there is clear evidence that that completions will begin in 5 years.</p> <p>The Council has not supplied a schedule of sites which make up the figure of 2,199, nor has it provided evidence to confirm that the relevant sites meet the requirements of the definition of deliverable in the NPPF. The Council must supply detailed evidence in relation to the sites that support this figure, including a housing delivery trajectory, and should do so at the latest on</p>

		publication of the Regulation 19 Plan (Submission Version).
3. Sites identified in land availability assessments	364	<p>The Council has included a list of sites identified in Land Availability Assessments on page 87 of the document. The following points arise:</p> <ul style="list-style-type: none"> • First, the table on page 13 refers to 364 units whereas the table on page 87 refers to 204 units without any explanation of the discrepancy. • Second, having regard to the text on page 87, the sites listed are suitable, available and achievable, do not require a policy change to be brought forward and will typically support less than 50 houses. We are unsure why the LPA has chosen to itemise these sites, but not others that presumably make up the difference between 204 in the table on page 87 and 364 in the supply table. • We are unsure also why the LPA has not chosen to allocate at least some of these sites, given that they are said to be deliverable (subject to testing) and could presumably contribute to the requirement to allocate at least 10% of the housing requirement on sites no larger than 1 hectare. • Moreover, if they are not to be allocated, they are presumably to be treated as 'windfalls'. If listed separately in the supply table, that also places doubt on the robustness of the LPA's windfall allowance (given that 364 units comprises at least 2 years of windfalls, adopting the LPA's assumptions on windfall completions). <p>We conclude that the LPA has not provided evidence to justify the inclusion of these sites so that Row 3 should be deleted.</p>
4. Sites identified in the Brownfield Land Register (BLR)	200	<p>Appendix D to the Supplementary Consultation document (pages 85-86) lists 14 sites from the BLR which are not allocated for development and which are expected to contribute towards supply.</p> <p>It acknowledges that BLR/017 (National Motorcycle Museum) should be discounted as the Council is not aware that it is being promoted for redevelopment. The potential supply from these sites is between 74 and 314 dwellings. The LPA has used a figure of 200 as an approximate mid-point within the range. St Philips is concerned about this for the following reasons.</p> <ul style="list-style-type: none"> • As with the sites in Row 3, the sites from the BLR should either (i) be identified as allocations with evidence to support the LPA's conclusion that they will contribute to supply, including as a response to paragraph 68 (a) of the NPPF; or (ii) if not allocated, should be treated as windfalls (and inclusion as a separate category also undermines the LPA's windfall assumption). • Even if it were reasonable to include supply from BLR sites in the supply table in the way that Solihull MBC has (and St Philips' view is that it is not), there is no evidence provided to support taking a mid-point between the

		<p>minimum and maximum capacity assumptions for those sites. The NPPF and the Planning Practice Guidance are clear that Local Plans should plan positively for development with the Standard Method representing a minimum target for delivery. In that context, taking what may be an optimistic mid-point rather than a prudent minimum is not justified.</p> <p>Given the current lack of evidence to support the inclusion of BLR sites St Philips considers they should be removed from the supply calculation.</p>
5. Solihull Local Plan allocations without planning permission at 1 st April 2018	1,236	<p>The four sites that comprise the 1,236 units in Row 5 are listed in Appendix D (p.85). However, the LPA has not given any detailed explanation in the supporting text to explain why those sites have not come forward as anticipated, or to explain why it considers that any matters that have constrained their delivery to date have been resolved, or will be resolved in a reasonable timescale, so as to justify their continued allocation in the plan at the capacities identified.</p> <p>Similar to the comments against Row 2 (sites with permission not started) the Council must provide evidence to support the figure stated, and to support the continued allocation of these sites. St Philips acknowledges that the Council intends to do so at Submission Stage but, nonetheless, no evidence on deliverability has been provided to support the assumptions set out in the current consultation so that there is potential for this figure to be reduced, particularly in relation to 'Phase 1' sites and their delivery within the first 5 years of the Plan period.</p>
6. Less a 10% to sites with planning permission (not started), sites identified in land availability assessments and SLP sites	-400	<p>The Council should provide evidence to support the use of 10% as a discount allowance, as opposed to any higher figure. Moreover, the discount is applied to sites identified in Land Availability Assessments, which we consider should be excluded from the supply calculations (on the basis that, if not allocated, they would comprise windfalls). St Philips reserves the right to comment once the evidence to support this assumption is made available.</p>
7. Windfall housing land supply (2018-2033)	2,250	<p>The Council is required to release land from the green belt to meet its Local Housing Need, and unmet need from the HMA, and should also be allocating Safeguarded Land to meet the requirements set out at paragraphs 22 and 139 of the NPPF (2019). In so doing, the LPA must be able to demonstrate that it has maximised the opportunity to deliver sites from within the urban area and on land outside the green belt, and should take steps to allocate as much land as possible to support the delivery of new housing.</p> <p>In this context St Philips has commented already on the LPA's reference to sites identified in Housing Land Assessments and to BLR sites, and has noted the requirement in paragraph 68 (a) of the NPPF in relation to the need to identify small sites of less than 1 ha to contribute to land supply.</p>

		<p>St Philips acknowledges that the inspector who examined the SLP agreed with a windfall allowance of 150 dwellings per annum. However, the BDP has since been examined and the scale of unmet need across the HMA has been assessed, and with an as yet undefined proportion of that to be met in Solihull. The LPA must adjust its green belt boundaries to accommodate its Local Housing Need and cross-boundary needs, and must first ensure that it has identified and allocated all deliverable capacity from sites outside the green belt (including from sites of less than 1ha). Having done so, the potential for a continued supply of windfall completions at a rate of 150 per annum must be questionable.</p> <p>Moreover, the current figure of 2,250 windfall completions comprises 14% of the overall housing land supply for the Borough, which St Philips considers is high, having regard the comments above. Further evidence-based justification is required from the Council to support such a high reliance on windfall sites, as this has a very significant bearing on the quantum of land required for additional homes, and for the setting of appropriate green belt boundaries now that may endure well beyond the plan period.</p>
8. UK Central Hub Area	2,500	<p>St Philips does not question the ability of the UK Central Hub Area to contribute to major growth in the Borough but notes that the Council has increased its assumption on the delivery of housing from the UK Central Hub over the plan period from 1,000 dwellings in the 2016 LPR consultation, to 2,500.</p> <p>Given the significance of the UK Central Hub to the supply of housing in the Borough (the current assumption of 2,500 units comprises 15% of the proposed housing land supply, and 28% of the sites that are currently proposed for allocation) it is imperative that the Council can thoroughly justify the assumptions that it makes in terms of delivery within the plan period.</p> <p>In this regard, we note that the delivery trajectory set out in the UK Central Framework Plan sets out Low and High delivery assumptions from 2018-2032 with those ranging from 990 to 2,650, but with an assumption that a significant proportion (550 to 1,150) would occur in the next five years (i.e. prior to 2023). Given the substantial infrastructure requirements associated with this scheme, and the associated lead-in time, St Philips considers that a prudent approach would be to adopt, as a maximum for the purpose of the plan-making process, the low delivery assumption of 990 units. The Delivery Trajectory is set out in the table beneath this table.</p> <p>St Philips expects that the LPA will publish more evidence on the lead-in times to the delivery of new housing from the UK Central Hub and in relation to phasing and programme. In advance of that, St Philips considers that a more prudent approach is as set out above.</p>
9. Allocated Sites	6,310	<p>No comment in advance of the publication of finalised housing numbers and delivery trajectories for each of the allocated sites.</p>

Total Estimated Capacity (Rows 1 – 7)	15,765	Taking the above comments into consideration, and in particular the lack of evidence to substantiate the assumptions in relation to Rows 3, 4, 5, 7 and 8, St Philips considers that there is significant concern relating to the ability of the Council to meet its Local Housing Need and a proportion of wider HMA need without the identification of additional allocations. Given that the Council will have taken every opportunity to identify land within the urban area this will necessarily require the identification of additional land for housing outside the urban area.
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UK Central Hub Delivery Assumptions: The Hub Framework Plan, Issue 2 21 February 2018 (page 30)

UK Central Hub Phase	Time Period	Potential Range of Dwellings at the Hub (Low to High) 4	
Phase 1	2018-2022	130	550
Phase 2	2023-2027	420	600
Phase 3	2028-2032	440	1,500
Phase 4	Post 2032	800	2,020
Total to 2032	(mid-range: 1,820)	990	2,650
Overall Total	(mid-range: 3,230)	1,790	4,670

Summary

- 2.11 St Philips agrees with the approach taken by Solihull MBC to applying the Standard Method for calculating housing need for the Plan period, but notes that the calculation provides a minimum figure and a starting point for the preparation of the Local Plan.
- 2.12 In relation to cross boundary need St Philips acknowledges that the Council has said that there is potential for the current assumption of 2,000 dwellings to be revised as part of the Submission Draft. There is, however, no justification for the figure currently chosen, and a substantial opportunity for Solihull to make a greater contribution given its relationship with Birmingham CC's administrative area. Once thoroughly assessed, the overall shortfall may increase, which may have a bearing on the adjusted Local Housing Need figure of 885 dwellings per annum that the Council has adopted for the purpose of this consultation.
- 2.13 St Philips notes that changes have been made to the duration of the plan period between the publication of the Draft Local Plan and the Supplementary Consultation. The Local Plan is unlikely to be adopted until 2020, so that the remaining plan period will be 15 years, in line with the current national planning policy guidance. Notwithstanding this, St Philips recommend that the plan period should be extended to 2036 in line with the Strategic Growth Study prepared by G L Hearn, which forms part of the Council's evidence base for the Draft Local Plan Preparation. Should the Council wish to discount this evidence, sufficient justification should be provided to support the delivery of housing to accommodate the wider HMA shortfall.
- 2.14 The NPPF advises in relation to the definition of green belt boundaries that 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"*. This is a critical matter for the Solihull Local Plan given that the Borough is substantially constrained by green belt and that paragraph 139 (e) goes on to say that plans should *"be able to demonstrate that green belt boundaries will not need to be altered at the end of the plan period"*.

- 2.15 The draft Local Plan does not meet the objectives of the NPPF (2019) as it does not identify a supply of safeguarded land that will secure green belt boundaries well beyond the plan period. That safeguarded land should be able to accommodate at least 5, and arguably 10, years additional supply.
- 2.16 St Philips is also concerned that the land supply assumptions over state supply for the following reasons:-
- the capacity of the 'Sites with Planning Permission' (Row 2) cannot be relied upon without confirmation of the sites that are included and evidence that they meet the definition of 'deliverable' in the NPPF;
 - there is no justification for the inclusion of an allowance for 'Land Availability Assessment' sites (Row 3) or Brownfield Land Register sites (Row 4) as separate elements of supply as such sites should be allocated, or form part of the windfall allowance;
 - the figure for 'Solihull Local Plan Allocations without planning permission' (Row 5) must be tested against evidence of their deliverability given that they have not come forward as expected when allocated;
 - the reliance on 150 windfall completions per annum appears inappropriately high as a proportion of total supply, and having regard to the need for the LPA to ensure that it has identified all sustainable options for housing development in the urban area and outside the green belt; and
 - the assumption on the number of units to be delivered from UK Central Hub Area within the plan period is not currently supported by evidence.
- 2.17 St Philips looks forward to the publication of evidence to support the Council's housing land supply position in advance of the publication of the Submission Version of the Local Plan. In the meantime St Philips does not consider that the Council has justified its assumptions on supply, or its position in relation to the HMA shortfall, such that there is a clear need to identify additional land to support the delivery of large-scale sites, and/or to include a review mechanism that will secure additional sites in the event of a failure to deliver. Moreover, the Council must identify areas of Safeguarded Land to meet longer term needs so as to ensure that the green belt boundaries to be set by the Local Plan Review will endure.

Question 2

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

Step 1 – Site Hierarchy

- 2.18 As set out in the Consultation document, Step 1 of the Site Selection process seeks to provide a balanced approach whereby brownfield sites, accessible sites and lower performing Green Belt sites are taken forward due to their development potential. This reflects guidance at paragraph 138 of the NPPF (2019) which states 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 has been previously-developed and/or is well-served by public transport”* so that the general approach is supported.
- 2.19 Proposed sites have then been afforded a score between 1 and 10, based on the performance of the site in green belt terms as assessed in the Solihull Strategic Green Belt Assessment (July 2016) and an assessment of the availability of public transport. Sites were then afforded a 'RAG' status as per the following criteria:-
- Green (1-4) - suitable for inclusion within the Plan;
 - Yellow (5) - potential inclusion sites;
 - Blue (6-7) - unlikely inclusion sites; and
 - Red (8-10) - unsuitable for inclusion within the Plan.
- 2.20 St Phillips does not disagree with the general approach of providing a RAG classification to each site assessment. Indeed, it is noted that the land in which St Phillips has an interest to the east of Coleshill Heath Road (Site 131) scored a 5 in the Step 1 assessment, with sites scoring 5 being defined as sites that are:-
- “Greenfield in accessible, lower performing Green Belt location: Green Belt non PDL in accessible location.*
- 2.21 Sites that comprise *“Lower performing Green Belt”* are said to generally have a combined score of 5 or less in the Green Belt Assessment (GBA). Site 131 achieved a combined score of 3.
- 2.22 The Consultation Documents advise that sites that fall within Priorities 1 to 4 (i.e. 'green' sites) should generally be considered suitable for inclusion in the plan unless there are exceptional reasons why they should not be included. Sites that fall within priorities 8 to 10 (i.e. 'red' sites) should be considered unsuitable for inclusion unless there are exceptional reasons why they should be included.
- 2.23 Sites that fall within priorities 5 to 7 are considered *“to have potential to be included”*. A distinction is made between Priority 5 sites and Priority 6 and 7 sites. Priority 5 sites (i.e. 'yellow' sites) are seen as *“potential inclusions”* whereas Priority 6 and 7 (i.e. 'blue' sites) sites are seen as *“unlikely inclusions”*. Again St Phillips does not disagree with this general approach (noting that Site 131 was a 'yellow' site at Step 1).

Step 2 – Refinement Criteria

- 2.24 As set out in the consultation document, Step 2 considers sites in relation to other considerations such as site constraints and the spatial strategy, *“to give a finer grain analysis to the submitted sites”*. This element is said to rely on site specific planning judgment, and is the step at which the LPA arrives at a view on whether a site should be allocated or not. The result is that sites are classified as green, amber or red at the end of Step 2.

2.25 The Consultation Document goes on to say that Step 2 will be used:-

“principally to confirm whether ‘potential’ allocations (yellow) should be included as green or amber sites in the consultation, and whether ‘unlikely’ allocations (blue) should be included as amber or red sites in the consultation”.

2.26 Whilst St Phillips does not disagree with the general approach, it is noted with reference to Site 131 that the purpose of this step is to confirm whether ‘potential’ allocations (yellow) should be included as green or amber sites, not as red sites. The Summary Illustration of the Site Selection Process does not, however, correspond with the text as it appears to show that yellow sites may be confirmed as red sites. According to the text, yellow sites may only be categorised following Step 2 as ‘green’ or ‘amber’ sites.

2.27 For ease of reference the refinement criteria are replicated below:

Factors in Favour	Factors Against
In accordance with the spatial strategy.	Not in accordance with the spatial strategy.
Any hard constraints only affect a small proportion of the site and/or can be mitigated.	Overriding hard constraints that cannot be mitigated.
Site would not breach a strong defensible boundary to the Green Belt.	SHEELA category 3 sites unless demonstrated that concerns can be overcome.
Any identified wider planning gain over and above what would normally be expected.	Site would breach a strong defensible boundary to the Green Belt.
Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.	Sites that would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.
If finer grain accessibility analysis shows the site (or the part to included) as accessible.	If finer grain accessibility analysis shows the site (or the part to be included) is not accessible.
	If the site is in a landscape character area that has a very low landscape capacity rating.
	If the SA appraisal identifies significant harmful impacts.

2.28 It is said that higher performing sites in the hierarchy need to result in more significant harmful impacts if they are to be excluded. No explanation is given, however, as to how the significance of potentially harmful impacts is to be assessed in the exercise of planning judgement.

2.29 Step 2 includes ‘Factors in Favour’ and ‘Factors Against’. We note that ‘Green Belt Boundaries’ are included and 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 in relation to the impact on the Green Belt are not included within the table at all.

2.30 More generally, no guidance is provided on how the Factors in Favour and Factors Against are ranked and/or weighted. Without such an explanation it is not clear how the individual, or relative, merits of sites are assessed. This is a weakness given that Step 2 is used to either include or reject sites for allocation.

2.31 Our concerns with the lack of transparency in the Step 2 approach are amplified in our response to Question 39 which asks whether there are any red sites omitted that should be included in the plan.

Question 39

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

- 2.32 St Philips has identified a number of reasons why the Council should allocate additional land to ensure that the Local Plan will meet its Local Housing Need and a proportion of the HMA shortfall; that it will address the correct plan period; and that it will set green belt boundaries that exclude safeguarded land as well as allocated sites so that they will endure well beyond the plan period. St Philips notes also that the capacity of the 'Amber sites' is only circa 700 units (subject to further assessment).
- 2.33 It follows that St Philips considers that omitted red sites should be included if the Plan is found to be sound, and that land at Coleshill Heath Road (Site 131) should be included.
- 2.34 We note at this point that the Vision Document submitted previously and again with these representations is based on the collection of evidence related to technical and environmental matters, including accessibility, landscape and highways. The Vision Document confirms that any site constraints may be mitigated and that the site is capable of development within 5 years.
- 2.35 In relation to the Step 1 Site Assessment, we note also that the Strategic Green Belt Assessment (July 2016) concluded that Refined Parcel RP08 (land immediately east of Birmingham Business Park) is given a combined score of 3, with its highest score being 2 in relation to Purpose 1 (to check the unrestricted sprawl of large built up areas). A score of 2 means that the boundary is weak but can be identified so that the parcel is "*moderately performing*" in relation to that purpose. We note also that RP08 "*does not perform*" against Purpose 2 (to prevent neighbouring towns from merging together) or Purpose 4 (to preserve the setting of historic towns), and that it is "*lower performing*" in relation to Purpose 3 (to assist in safeguarding the countryside from encroachment).
- 2.36 In relation to accessibility factors, the Site Assessment document summarises that in the following way:-
- Primary School: Very High
 - Food Store: Very High
 - GP Surgery: Medium
 - Public Transport: Very High (Rail)
 - Overall: Very High
 - Access: No existing footway provision
- 2.37 On this basis St Philips agrees that the site was rightly scored '5' at Step 1, which is the lowest (i.e. the most favourable) score that any green belt site may achieve, if it is not already subject to a commitment for development.
- 2.38 We assume that the Step 2 Assessment will have scored the site highly in terms of 'Factors in Favour' given the lack of hard constraints (and limited soft constraints) and that it comprises part of a 'Lower Performing Refined Parcel' (with a combined score of 3 against the 'threshold' score for lower performing parcels of a combined score of 5).
- 2.39 We have, therefore, considered below the performance of the site against the 'Factors Against' criteria as it is assumed that the site must have scored very poorly indeed against these factors to justify it being moved from a 'yellow' to a 'red' site (a change in status that the text at paragraph 73 does not contemplate), rather than to an 'amber' site, with the effect that it is omitted from inclusion within the Plan.

'Not in Accordance with the Spatial Strategy'

- 2.40 The Spatial Strategy outlined in the DLP (2016) confirms a sequential approach will be taken to directing growth focussed, in the first instance, on delivering non-green belt land and greenfield land, where this is highly or moderately accessible and not in reasonable beneficial use. Focus will then turn to green belt land.
- 2.41 Under all circumstances, sites must be in a highly or moderately accessible location. In this respect, Site 131 has excellent access to services and sustainable infrastructure being located adjacent to an established residential area with good existing public transport links and pedestrian and cycle ways. To the west the site is bordered by Birmingham Business Park, affording employment opportunities to future residents.
- 2.42 We have noted above that the site was assessed at Step 1 as a 'yellow' site (Priority 5) which is the lowest (i.e. most favourable) score that any green belt site may achieve if not already subject to a commitment for development. We conclude that, to this extent, the site performs well against the Spatial Strategy and aligns with it at least as well as 'blue' (Priority 6 and 7) sites. Moreover, the consultation document is clear at paragraph 70 that Priority 5 sites are viewed as "*potential inclusions*" in the plan.
- 2.43 In this context we conclude that Site 131 is exceptionally well placed, in accordance with the key criteria applied in Step 1 and the Site Hierarchy, to move to 'green' status and to contribute to the need for additional housing land.
- 2.44 Notwithstanding the above, we note that paragraph 5 of the Supplementary Consultation document states that the Council intend to "*amend the overall spatial strategy set out in the DLP*" through the Submission version of the plan. It is, therefore, difficult to comment further on this Factor Against at this stage.

'Overriding Hard Constraints that cannot be Mitigated'

- 2.45 The Vision Document submitted with these representations sets out the main constraints to development within the proposed site boundary, which include an oil pipeline and habitats of wildlife interest. It includes also an Illustrative Masterplan which demonstrates how the site could accommodate up to 135 residential units, whilst mitigating these constraints.
- 2.46 In any event, we note that the Council has confirmed in the Site Assessments that the site is not subject to any constraints that can be considered 'hard'. On this basis, we conclude that this factor must not have counted against the site in its relegation at Step 2 from 'yellow' to 'red' status.

'SHELAA Category 3 Sites unless Demonstrated that Concerns can be Overcome'

- 2.47 The SHELAA was prepared in November 2016 by PBA. The commentary for Site 131 confirms that the site comprises "*open meadow with PRow/cycle path intersecting the site. The site surrounds a mixture of residential and employment uses and benefits from good access to facilities and services.*" Furthermore, it is noted that the site performs well against suitability and availability criteria but that it faces some achievability constraints associated its marketability in the context of its proximity to the business park.
- 2.48 The SHELAA concludes that the site sits within Category 2. Category 2 sites are defined in the main report as:

"Sites with a limited level of constraints, such that they are likely to be available for the delivery after the first five years, inter alia. These 'developable' sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints within a 6 to 10 year time horizon."

2.49 As noted above, the Illustrative Masterplan within the Vision Document demonstrates that the identified site constraints can be accommodated and/or mitigated. Furthermore, the landowner has confirmed deliverability of the site within the first five years of the Plan period, in line with the draft trajectory set out at Section 5 of the Vision Document.

2.50 We conclude that Site 131 is not in conflict with this factor, because it is not a Category 3 site. Moreover, the limited constraints noted in its categorisation as a Category 2 site can be overcome.

'Site Would Breach a Strong Defensible Boundary to the Green Belt'

2.51 The Strategic Green Belt Assessment (July 2016) concluded that Refined Parcel RP08 (land immediately east of Birmingham Business Park), which includes Site 131, is given a combined score of 3, with its highest score being 2 in relation to Purpose 1 (to check the unrestricted sprawl of large built up areas). A score of 2 means that the boundary is *"weak but can be identified"* so that the parcel is *"moderately performing"* in relation to that purpose. Parcel RP08 *"does not perform"* against Purpose 2 (to prevent neighbouring towns from merging together), or Purpose 4 (to preserve the setting of historic towns), and is *"lower performing"* in relation to Purpose 3 (to assist in safeguarding the countryside from encroachment).

2.52 As a consequence, the site was rated as Priority 5 ('yellow') at the Step 1 Assessment which, as we have noted, is the lowest (most favourable) score that a green belt site may achieve if not already subject to a commitment for development.

2.53 Whilst the Site Assessment for Site 131 confirms that the site is within a *"lower performing parcel"* in the Green Belt, it goes on to say that its development:-

"would result in the loss of an important green belt gap and corridor and threaten the integrity of the green belt further to the west. Inter alia, it would have a detrimental impact on the green belt and coalescence."

2.54 This commentary is at odds with the rating of the site as Priority 5, not least as RP08 *"does not perform"* against Purpose 2 and is *"lower performing"* against Purpose 3.

2.55 The Strategic Green Belt Assessment states in relation to Purpose 1 that:-

"RP08 boundary to the east is weak bordering Birmingham Business Park but is stronger at its boundary with Coleshill Heath Road. There is no development present within the refined parcel".

2.56 Site conditions are set to change with the proposed delivery of the East Birmingham to Solihull Extension (EBSE) Midland Metro route. The proposed route passes through the site on an oblique alignment running from a point opposite Chelmsley Road to link with The Crescent within Birmingham Business Park, connecting the Business Park to the urban area. The alignment coincides broadly with the footpath and cycleway which is shown on the Opportunities and Constraints Plan at p.28 of the Vision Document.

2.57 In any event, the Strategic Green Belt Assessment does not characterise the boundaries as strong (noting that its commentary relates to a larger parcel than Site 131) with the boundary to the east being judged as *"weak"* and that to the west as *"stronger"* (but not *"strong"*). Hence, the refined parcel is only *"moderately performing"* in relation to Purpose 1. On this basis St Philips concludes that this factor counts strongly against the allocation of the site.

2.58 Whilst St Philips is promoting the release of the whole of the site from the green belt, the Illustrative Masterplan included in the Vision Document confirms that a substantial green buffer would be retained between Birmingham Business Park and the eastern edge of the new development, and that substantial existing planting in this part of the site, and on its northern and southern boundaries, would be retained. This would maintain a sense of separation between the Business Park and urban area.

2.59 We note also that Site 77 has been assessed as suitable for employment uses. The site is located to the south of Site 131 and to the south west of Birmingham Business Park and in the same Refined Parcel. The site scores 7 positive and 2 negative effects in the Council's SA, as does Site 131. Whilst both sites produced the same set of results, Site 131 was considered as unsuitable for development and the commentary in the proforma for Site 77 confirms that the site could be considered as an extension to the existing Business Park.

'Sites that Would Not Use or Create a Strong Defensible Boundary to Define the Extent of Land to be Removed from the Green Belt'

2.60 As demonstrated in the Vision Document, Site 131 is well contained and supported by strong defensible boundaries.

- To the north the site is bordered by the A452.
- To the east the site is bordered by Birmingham Business Park.
- The access to Wright's Farm is located adjacent to the southern boundary.
- Coleshill Heath Road borders the site to the east.

2.61 On this basis the extent of land to be removed from the green belt would be clear and defined by defensible boundaries to the north and south.

'If Finer Grain Accessibility Analysis Shows the Site (or part of the site) is not Accessible'

2.62 The development of the Illustrative Masterplan in the Vision Document was supported by a transport assessment. This confirmed that that site is well located in terms of the strategic highway network, with M6 J4 located 2km away via Coleshill Heath Road, and M42 J6 accessed via the A45.

2.63 A number of footways are located adjacent to the site providing connection on foot to key destinations including the Chelmsley Wood shopping centre and interchange. In addition, an existing foot and cycle path crosses the site linking Birmingham Business Park to Coleshill Heath Road via the Godwin Way.

2.64 In terms of public transport, high frequency bus services serve stops on Coleshill Heath Road providing connections to key destinations including Birmingham City Centre, Chelmsley Wood and the Heartlands Hospital. Marston Green Railway Station and Birmingham International are both located approximately 2.5km from the site and offer frequent services to Birmingham New Street and Birmingham International, providing further connectivity to national destinations such as London, Manchester and Edinburgh.

2.65 We conclude that a 'finer grain accessibility analysis' has been undertaken to support the preparation of the Vision Document and Illustrative Masterplan which has reconfirmed the conclusion reached in the Step 1 Assessment that the site is highly accessible and should be considered positively in this respect.

'If the Site is in a Landscape Character Area that has a Very Low Landscape Capacity Rating'

2.66 The site is located in LCA 10B, which extends into the urban area of Solihull providing a series of green spaces. The area to the east of LCA 10B along Coleshill Heath Road and closer to the M42 corridor tends to be busy and dominated by the impacts of major transport infrastructure.

- 2.67 The Solihull Borough Landscape Character Assessment (2016) confirms that the sub-area is able to accommodate some areas of new development provided that would be in keeping with the type, scale and form of the existing landscape character and local distinctiveness.
- 2.68 Tree cover is a key character driver for this locality. Small pockets of deciduous woodland are scattered across the area, including an Ancient Woodland to the south. Tree cover is extensive and includes street trees, hedgerow trees, woodlands and trees within parks. Coleshill Heath Road and Chester Road are also lined with trees, supplementing the extensive tree cover in the area. The northern boundary of the site comprises dense vegetation. Similarly, the eastern boundary separating the site from Birmingham Business Park is made up of dense vegetation limited view to small gaps and access points.
- 2.69 The indicative landscaping strategy in the Vision Document describes how the identified LCA characteristics will be retained and enhanced. This will be achieved by setting development in an area of public green space ensuring the proposed development is well integrated into the host landscape and the immediate setting. This will create an attractive public asset through the provision of purposeful and functional open space to the benefit of existing and future residents.
- 2.70 Through the retention and incorporation of existing trees and vegetation the effects of the development will be limited, and the site will retain characteristics typical of the LCA. Site 131 may, therefore, be considered favourably against this factor.

'If the SA Appraisal Identifies Significant Harmful Impacts'

- 2.71 The SHELAA confirms that the Interim Sustainability Appraisal Report (2017) identifies 7 positive effects, 8 neutral effects and 2 negative effects. The negative effects relate to Objectives SA1: Regeneration and economic development, and SA14: Amenity.
- 2.72 Objective SA1 seeks development that will contribute to the regeneration and economic development initiatives that benefit the Borough's communities; especially those identified as deprived. The appraisal criteria and thresholds for this objective are as follows.
- **Located within the top 10% most deprived:** significant positive effects are more likely to be experienced so that a score of dark green is awarded. Positive effects may arise through the creation of accessible jobs, affordable housing and improved environments.
 - **Located within top 20% most deprived:** positive effects likely so that a score of light green is awarded.
 - **Located within top 40% most deprived:** neutral effects are likely and a grey score is awarded.
 - **Located within 60% least deprived:** negative effects are likely and mitigation may be necessary. An amber score would be awarded in this scenario.
- 2.73 The site is located approximately 1 mile from Chelmsley Wood and 1.5 miles from Marston Green. The Supplementary Consultation document confirms that Chelmsley Wood *"has a high proportion of local neighbourhoods within the 10% most deprived in the country and some in the bottom 5%"*. Conversely, Marston Green is described as being a popular mature residential suburb which is generally affluent in character with good schools, strong local centres and lower than average unemployment levels.
- 2.74 The site has been awarded an amber score in the SA because it is located within the 60% least deprived areas. However, St Philips considers that a positive effect would be expected to arise where development would be located near to communities that are recorded as having a greater level of deprivation. In this context, consideration should be given to the site's proximity to Chelmsley Wood, so that an amber rating

does not reflect the positive benefits that the site could bring in terms of affordable housing and improved access to open space and recreational facilities in particular.

2.75 Objective SA14 relates to Amenity, in the sense that development should minimise impacts on air, soil, water, light and noise pollution. The appraisal criteria for this objective confirms that sources of noise adjacent to the site could affect amenity and that an assumption should be made by undertaking site visits, desktop analysis of mapping imagery and professional opinion. An amber scoring suggests that negative effects are likely to be experienced and that mitigation would be necessary. However, St Philips has undertaken various technical and environmental assessments as part of the technical analysis forming the basis of the Illustrative Masterplan. These confirm that, with sufficient measures in place, any negative effects in relation to amenity can be successfully mitigated to provide a high quality development for future residents.

2.76 Whilst it is recognised that the SA does not take into account mitigation measures, consideration should be given to rescoring the site, for the reasons given above, to ensure an accurate representation is provided, or to applying a more appropriate and positive planning judgement at Step 2.

Summary

2.77 The site was given a Priority 5 ('yellow') rating at the Step 1 Assessment which is the lowest (i.e. most favourable) score that any green belt site may achieve if not already subject to a commitment. The Step 2 Assessment then applies planning judgement to a series of 'Factors in Favour' and 'Factors Against'.

2.78 In relation to the Factors in Favour:-

- by virtue of its Priority 5 rating, the site is clearly well aligned with the Spatial Strategy, noting that green belt release is essential if Solihull is to meet its Local Housing Need and unmet need;
- the site has no 'hard constraints' (which is confirmed in the Site Assessment);
- a finer grain accessibility analysis has confirmed the favourable conclusions reached by the Council in its Step 1 Assessment; and
- the site will accommodate the East Birmingham to Solihull Extension Midland Metro route which is a further consideration in its favour.

2.79 In relation to the Factors Against:-

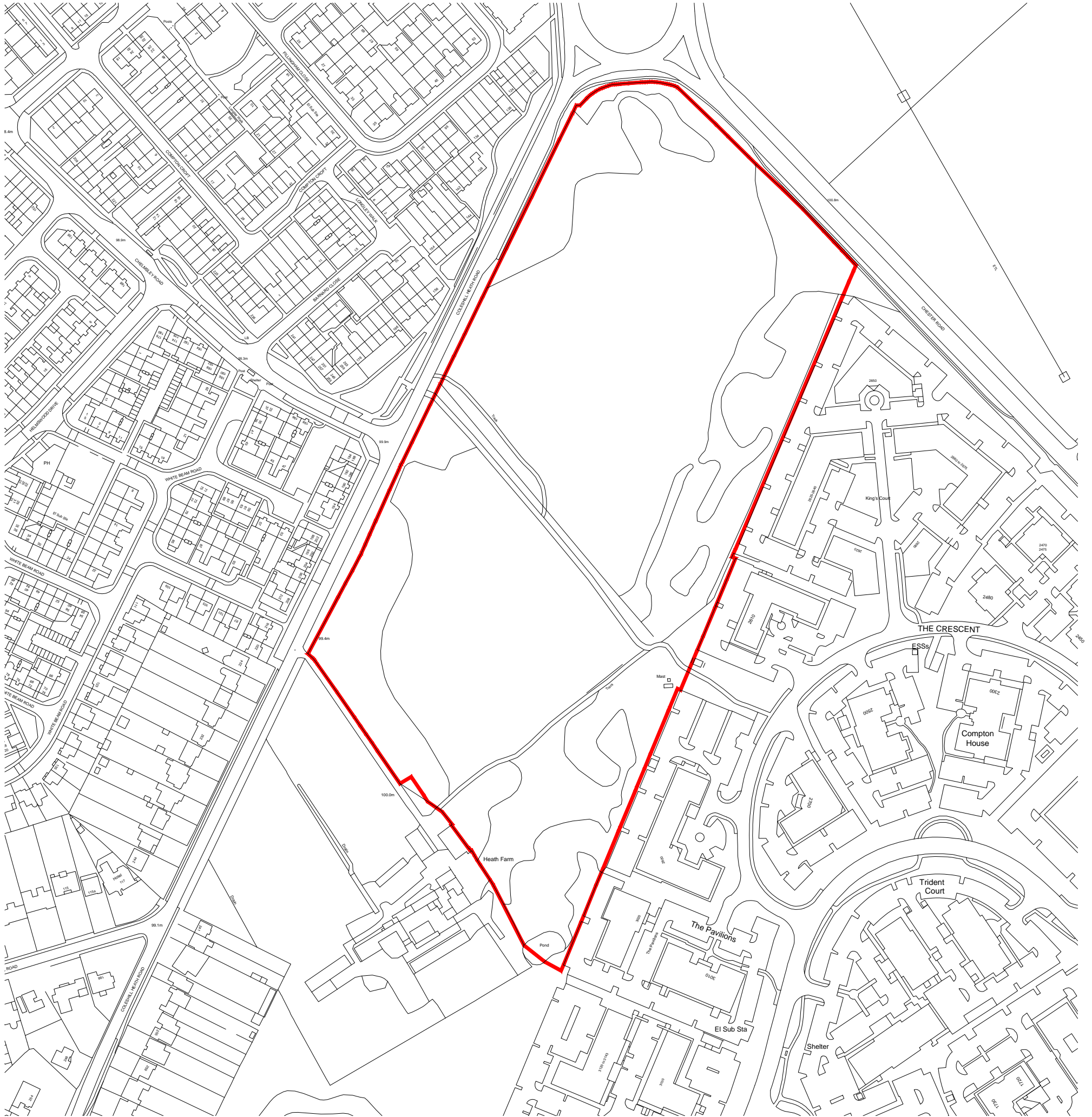
- the corollary of the conclusions reached in relation to the site's performance against the Spatial Strategy, that it is not affected by any hard constraints, and that it has very good accessibility credentials, is that the corresponding Factors Against do not hold against its allocation;
- the site is not a SHELAA Category 3 site (it is Category 2);
- the SA identifies 7 positive effects, 8 neutral effects and only 2 negative effects, with the negative effects relating to Objectives SA1: Regeneration and economic development, and SA14: Amenity in respect of which we have noted various mitigating factors; and
- the proposal to retain substantial mature landscaping throughout the site ensures that the development would be well assimilated into the host landscape.

- 2.80 In relation to those factors that relate to green belt boundaries, existing boundaries to the east and west are characterised in the Strategic Green Belt assessment as “*weak*” and “*stronger*”, but not strong. The boundaries to the north with the A452, and to the south with Wrights Farm, are strong and would provide long term defensible boundaries. In any event, the Strategic Green Belt Assessment concluded that Refined Parcel RP08, which includes Site 131, achieves a combined score of 3, with its highest score being 2 in relation to Purpose 1 (to check the unrestricted sprawl of large built up areas) so that it is “*moderately performing*” in relation to that purpose. Parcel RP08 “*does not perform*” against Purpose 2 (to prevent neighbouring towns from merging together), or to Purpose 3 (to assist in safeguarding the countryside from encroachment).
- 2.81 Our assessment of the site in the light of the Refinement Criteria set out under Step 2 of the Site Selection process concludes that the site performs positively. The Council’s conclusion that this ‘higher performing site’ (i.e. a site categorised as a ‘yellow’ site, and as a “*Potential Inclusion*”, after the Step 1 assessment) should be excluded and designated as a ‘red’ site is not justified having regard to the conclusions of the Site Assessment proforma and the SA.
- 2.82 This is particularly so given that the definition of a ‘red’ site within the Supplementary Consultation document means that:-
- “the development of the site has severe or widespread impacts that are not outweighed by the benefits of the proposal.”* (our emphasis)
- 2.83 The evidence does not support the planning judgment that the Council has applied, or the conclusions that the effects of development would be “*severe or widespread*”. The site should be re-categorised as a site which has the potential to accommodate a proportion of the Borough’s housing need, in line with the spatial strategy set out in the Draft Local Plan.
- 2.84 As demonstrated throughout these representations, the Council will need to release further land in addition to the green and amber sites that have already been identified, and will need to identify areas of Safeguarded Land, if the Plan is to be found sound on Examination. It is therefore considered that sites that are currently categorised as red will need to be reconsidered and brought forward to support the sites already identified.

Avison Young

Appendix I

Site Plan

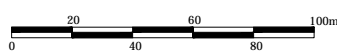
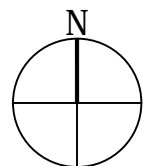


 Site boundary 9.19 Ha

Project
Birmingham Business Park

Drawing Title
Site Boundary Plan

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Appendix II

Land east of Coleshill Heath Road Vision Document

LAND EAST OF
COLESHILL HEATH ROAD
BIRMINGHAM





ST PHILIPS

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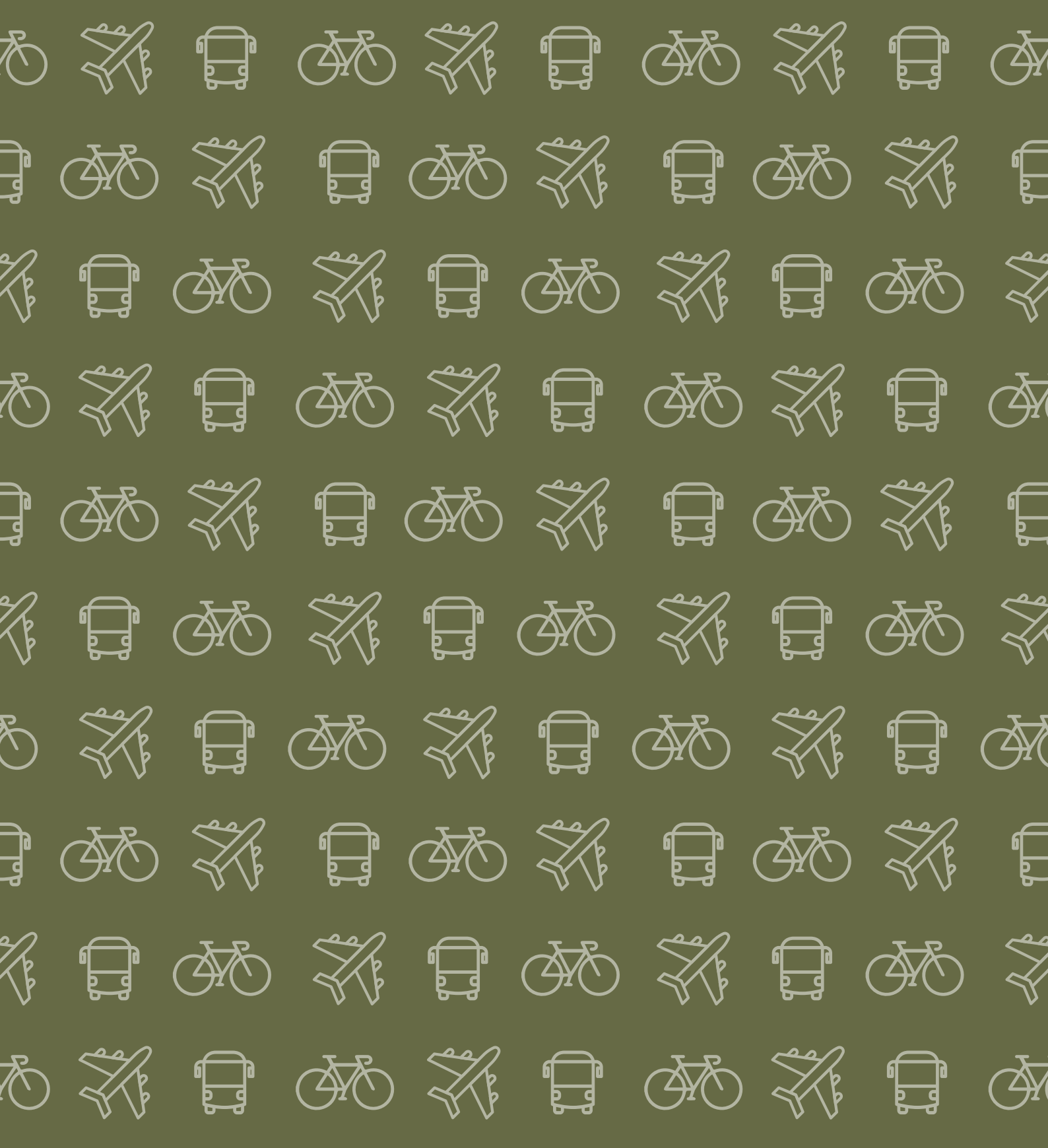
VISION



The site at Coleshill Heath Road is exceptionally placed to benefit from the plentiful sustainable transport and vehicular **linkages to local, national and international destinations**, including central Birmingham and Birmingham Airport.

The proposals will seek to provide and enhance **local connections**, ensuring that they respond to key desire lines and facilities, including Birmingham Business Park.

These linkages will complement the creation of a **high quality and distinctive scheme**, that takes cues from the existing settlement form, whilst also aspiring to form a place that facilitates **happy and healthy lifestyles**.



1. INTRODUCTION

This vision document has been prepared on behalf of St Philips Ltd to support the proposals for residential development at Coleshill Heath Road, Coleshill Heath.

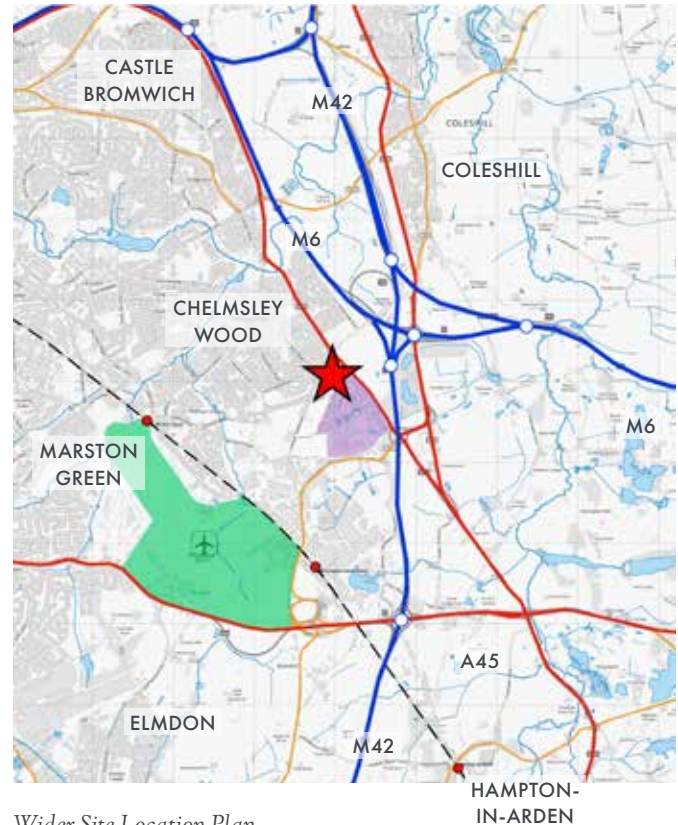
The purpose of this document is to support the promotion of the site to accommodate residential development. Key aims and objectives of the document are:

- To review the site in the context of current planning policy.
- To present an initial understanding of the site within the local context.
- To provide a summary of current site assessments undertaken to date, and;
- To present an emerging concept masterplan, accompanied by an explanation of the key design principles that have informed it.

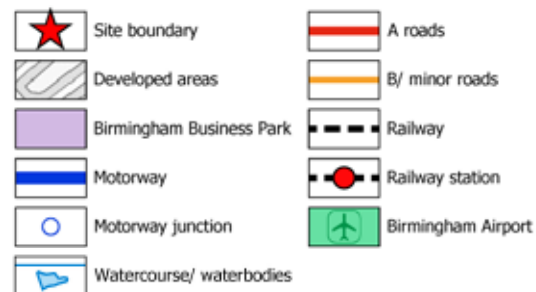
THE SITE

The site is 9.19 hectares (ha) in size and benefits from offering a great location in terms of linkages to local, national and international destinations. The site is located within Coleshill Heath, which lies approximately 2 and 12 kilometres (km) east of Marston Green and central Birmingham respectively. Birmingham Airport, Birmingham NEC and Junction 6 of the M42 are located approximately 3km south of the site.

The majority of the site comprises grassland and is broadly flat, with the exception of two existing subsoil mounds which will be regraded as part of the proposals. The boundaries of the site are defined by the A452 (Chester Road) to the north, Birmingham Business Park to the east, Heath Farm to the south and Coleshill Heath Road to the west. A Public Right of Way and designated traffic free cycle route bisects the site, running in a broadly east – west direction.

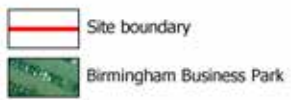


Wider Site Location Plan





Aerial Site Plan



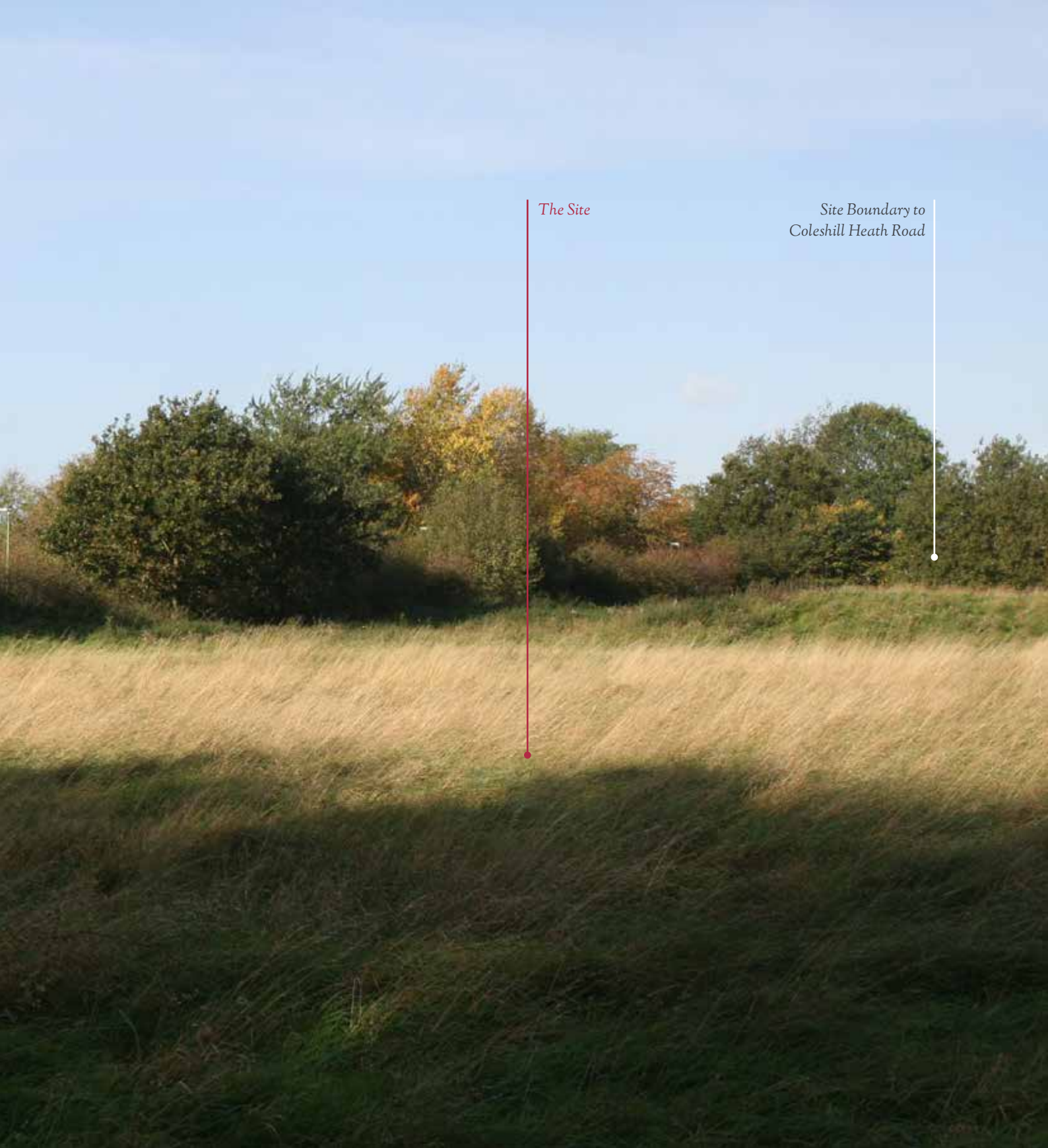
*Foot and cycle path crossing the site
(The Godwin Way)*

*Housing on Chelmsley Road
(obscured by vegetation)*

On-site: looking north-west towards the site boundary with Coleshill Heath Road, and housing on Chelmsley Road.

The Site

*Site Boundary to
Coleshill Heath Road*



2. PLANNING POLICY CONTEXT

Birmingham Business Park is located in the administrative area of Solihull. The extant local development framework for the area includes Solihull Local Plan (adopted December 2013) and Policies Map. Since the Local Plan was adopted, a legal challenge has resulted in the overall housing requirement being deleted and remitted back to the Council for reconsideration.

In addition, the Government's plans for high speed rail have now been granted for Phase One of the route. This is expected to open by 2026 with the first station outside of London to be built in Solihull on land next to the M42, opposite the NEC.

To ensure a suitable planning framework is in place that addresses these issues, the Council is currently undertaking a Local Plan Review.

The Council undertook a Scope, Issues and Options Consultation for the Local Plan Review between November 2015 and January 2016. This was followed by a Draft Local Plan Consultation between December 2016 and February 2017.

At present, the Local Plan Review proposes to allocate sufficient land for at least 6,522 net additional homes to ensure sufficient housing land supply to deliver 15,029 additional dwellings to the year 2033. This equates to an annual housing land provision target of 791 net additional dwellings per year. 18 development sites are allocated within the emerging document providing an indicative capacity of 6,150 dwellings. This does not include the development site.

Notwithstanding this position, there has been a significant level of industry representations that are opposed to the level of housing growth needed to meet the needs of Solihull, which has been led by the HBF.

Under the Duty to Cooperate, the Council have been working with its partners to address the shortfall identified in the Greater Birmingham Housing Market Area (2015), which equated to 37,500 dwellings over the period 2011 – 2031. In addition, the Council are addressing the need for 2,653 dwellings arising from Solihull itself together with the potential to accommodate a further 2,000 dwellings from the overall shortfall. This equates to a total of 4,653 dwellings which Solihull are currently testing.

The 14 Greater Birmingham Authorities also commissioned GL Hearn to prepare a HMA wide “Strategic Growth Study”. The outcome from the study was published in February 2018 and identifies a minimum net shortfall of 28,150 dwellings for the period 2011 – 2031 and minimum shortfall of 60,855 dwellings from 2011-2036.

The GL Hearn study has identified 24 areas of potential search for growth options ranging from potential new settlements to urban extensions.

It is clear however that the study forms an independent review which the Council's will need to take into account in identifying their considered options going forward.

LOCAL PLAN REVIEW TIMETABLE

To consider and test the findings of the Strategic Growth Study the Council agreed at the Cabinet meeting for Managed Growth (29 September 2018) that the recommended options should form part of a consultation at 'issues and options' level which could include (or be preceded by) a call for sites exercise that has a focus on strategic level growth options.

It is understood that the Council will seek to consult on additional or alternative sites, in February 2019, that may be required to either accommodate an increase in housing numbers, or potentially replace sites that will no longer be taken forward to the Submission Plan

The Council have proposed that the supplementary consultation will focus on the following:

- Identifying potential additional and alternative sites; and
- A review of the overall housing numbers in the context of the Standard Methodology.

STANDARDISED METHODOLOGY

The publication of the National Planning Policy Framework in July 2018 formalised the introduction of the standard methodology for calculating objectively assessed housing need in England. A review of the current methodology will be undertaken following the publication of household projections. It is anticipated that the results of this will be published before January 24 2019.

For Solihull this equates to 732 dwellings.

In light of this, and as set out, it will be necessary for the Council to identify and release additional land for residential development.

STRATEGIC HOUSING AND EMPLOYMENT LAND AVAILABILITY ASSESSMENT

The Council prepared a Strategic Housing and Employment Land Availability Assessment in 2016 (SHELAA) which reviewed potential development sites within the Borough. The SHELAA identified that 167 sites were most appropriate for housing development.

The site was promoted within this assessment for the delivery of up to 250 residential dwellings at a density of 36 units per hectare.

The SHELAA concluded that the site performs well against both the suitability and availability criteria, however, faces some achievability constraints. These include a 'moderate marketability and/or viability (unlikely to come forward within the first five years)' due to the site's location adjacent to a business park, is considered to impact the marketability of the site.

The site is therefore considered a 'Category 2 Site', which comprises "sites with a limited level of constraints, such that they are likely to be available for delivery after the first five years, inter alia. These 'developable' sites may be suitable for development, depending on their individual circumstances and on specific measures being proposed to overcome their constraints with a 6 to 10 year time horizon."

This Vision Document demonstrates that the site should be considered as a Category 1 Site and thus deliverable in the first 5 years of the plan period.

GREEN BELT ASSESSMENT

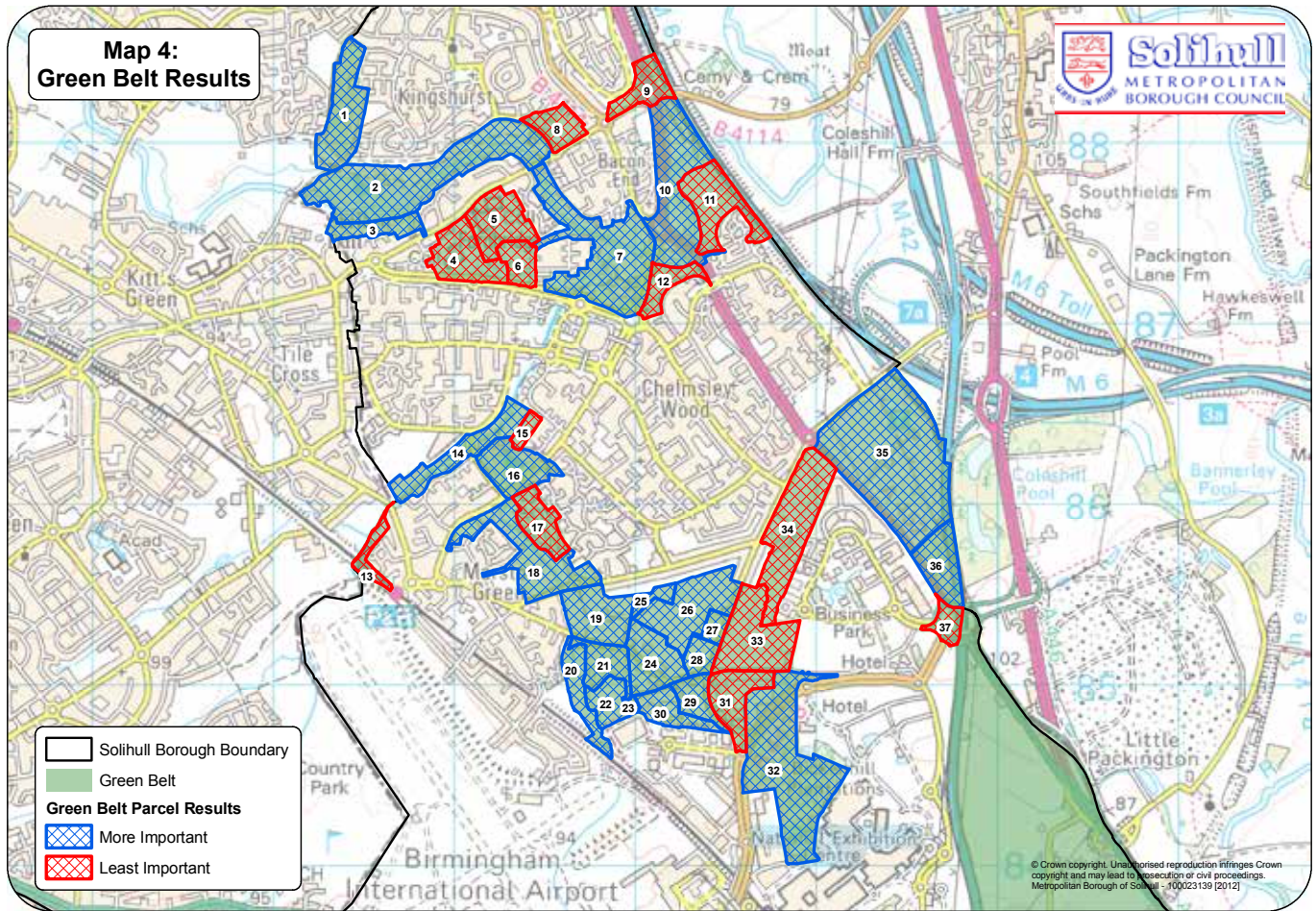
It is clear that the Borough does not have sufficient land to meet the demand of housing outlined in the emerging Local Plan resulting in a need to release land for future growth and development.

In order to demonstrate the land adjacent to Coleshill Heath Road is suitable, achievable and deliverable now, we have tested it against the five purposes of the Green Belt as set out in the NPPF (2018) at Paragraph 134:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site has been assessed within the Solihull Green Belt Assessment 2016 (Site Ref RPO8) and scores a total of 2; 'more moderately performing'.

As demonstrated in Map 4: Green Belt Results, the Council have concluded that the site, together with the adjoining parcels to the south (33 and 31) are 'least important'.



Solihull Metropolitan Borough Council Map 4 : Green Belt Results

Sites assessed within the report were assigned a score of ‘0, 1, 2 or 3’ for each of the purposes of the Green Belt test as set out in the NPPF.

0	Refined Parcel / Broad Area does not perform against the purpose
1	Refined Parcel / Broad Area performs lower against the purpose
2	Refined Parcel / Broad Area performs more moderately against the purpose
3	Refined Parcel / Broad Area performs higher against the purpose

The Assessment did not assess sites against the fifth purpose as ‘by virtue of its designation, all Green Belt land makes an equal contribution to this purpose, inter alia, this purpose would add no value to the Assessment.’

To check unrestricted sprawl of large built-up areas

The key aim of the West Midlands Metropolitan Green Belt (designated in 1975) is to prevent the unrestricted sprawl of Birmingham, Solihull and the Black Country and to prevent the coalescence of Birmingham and Coventry.

Taking this into consideration, the site well contained by the surrounding urban area:

- To the north, the site is bordered by the A452 beyond which is agricultural land also designated in as Green Belt.

- Adjacent to the site’s eastern boundary is Birmingham Business Park.
- The southern boundary is adjoined by Wright’s Farm.
- To the east, the site is bordered by Coleshill Heath Road beyond which are existing residential dwellings.

The site is not bordered by open landscape typical of more rural Green Belt locations. Future extensions to the development in this location would be significantly restricted in this location due to the site’s defensible boundaries, which act as containment barriers for the urban area of Chelmsley Wood. To prevent neighbouring towns merging into one another

The site therefore will not result in unrestricted sprawl on the Green Belt in this location.

To prevent neighbouring towns merging into one another

The site is located between Coleshill Heath Road and existing residential dwellings (to the east) and Birmingham Business Park (to the west). Removal of the Green Belt in this location would not result in the undue coalescence of two towns merging into one another.

To assist in safeguarding the countryside from encroachment

The extension of the built-up area in this location would be supported by the site’s permanent physical features and the surrounding urbanised environment. As a result, encroachment into the wider countryside would be restricted.

Whilst the Green Belt would be reduced in this location, if the site were to come forward, it is considered that a strong gap would be maintained to the north and east of the proposed development site.

To preserve the setting and special character of historic towns

As demonstrated through the Heritage Assessment undertaken for the site, there are no historic assets or Conservation Areas within or adjacent to the site boundary that would preclude development.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The Local Plan Review indicates a strategy that emphasises the use of previously developed land combined with the release of Green Field sites first and foremost. Notwithstanding this, it is acknowledged that the release of Green Belt sites within the Borough will be needed to meet housing demand.

The delivery of the land adjacent to Coleshill Heath Road will be appropriately phased and would not adversely impact regenerations schemes across the Borough and within the surrounding authority areas.

Summary

It is evident from the application of the above tests that the removal of land adjacent to Coleshill Heath Road from the Green Belt would not compromise the five purposes of the Green Belt as set out in Paragraph 134 of the NPPF.


It is therefore concluded that the allocation of the proposed development site presents a suitable development site to meet the housing needs of Solihull Metropolitan Borough Council.



Green Belt Purpose - Barriers to unrestricted sprawl of built-up areas



Green Belt Purpose - Safeguarding the countryside



*Birmingham Business Park
(obscured by tree belt)*

*Grass covered spoil mounds
(on site)*

On-site: looking south-west, along the tree belt. The boundary with Birmingham Business Park is obscured by the tree cover. The grass covered spoil mounds are clearly visible in this view.

The Site

*Foot and cycle path
crossing the site
(The Godwin Way)*



3. LOCAL CONTEXT

ACCESS AND MOVEMENT

Coleshill Heath Road operates in a north-south orientation on the western boundary of the proposed site, connecting to the A46 at its northern extent and the B4438 at its southern extent.

The site benefits from easy access to the strategic road network, with the M6 (Junction 4) located approximately 2km away via Coleshill Heath Road – A446. Junction 6 of the M42 is also located approximately 7km distance from the site via Coleshill Heath Road – B4438 – A45.

Footways adjacent to the main carriageway currently exist on Coleshill Heath Road between the Chelmsley Road junction and the A452 Roundabout. Footways also exist on Chelmsley Road in the vicinity of the site, providing a connection on foot to key destinations including the Chelmsley Wood shopping centre and interchange.

An existing foot and cycle path crosses the site east - west, linking Birmingham Business Park to Coleshill Heath road via the Godwin Way.

Existing bus stops on Coleshill Heath Road are currently served by high-frequency (every 6-minutes) bus services that provide connections to key destinations including Birmingham City Centre, Chelmsley Wood shopping centre and Heartlands Hospital. Chelmsley Interchange is also accessible via the bus services on Coleshill Heath Road, which provides connections to destinations including Solihull.

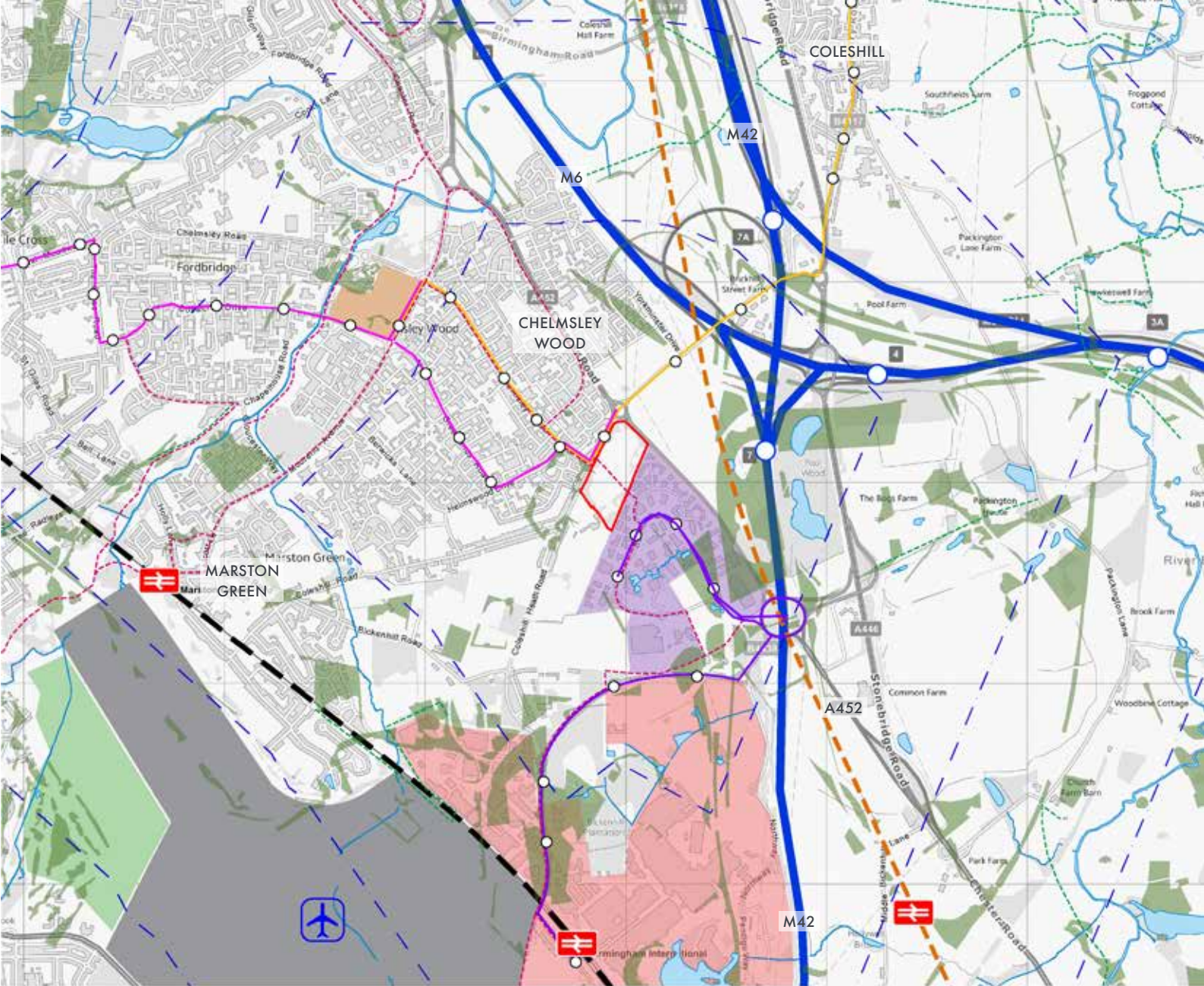
The nearest railway stations to the site are Marston Green and Birmingham International, which are both located approximately 2.5km from the site. Both stations offer frequent connections to regionally significant destinations including Birmingham City Centre. Birmingham International provides frequent connections to nationally significant destinations including London Euston, Manchester Piccadilly and Edinburgh Waverley.

Local bus services at Coleshill Heath Road

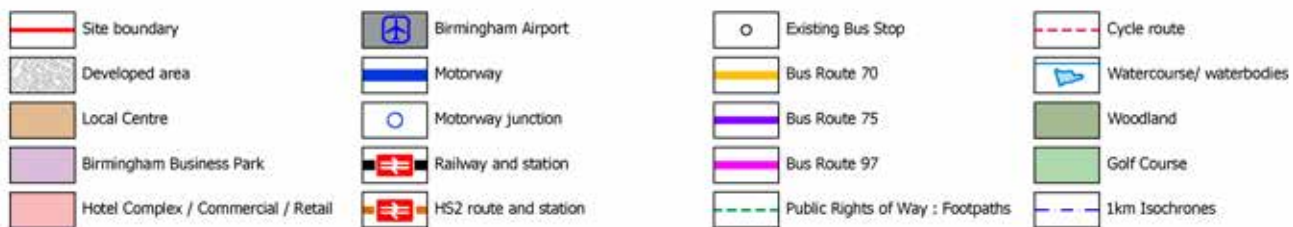


The Godwin Way Cycle routes passes through the site





Existing Access and Movement Plan



LOCAL FACILITIES

The site is well located in order for residents to access a range of amenities, services and employment.

Birmingham Business Park borders the eastern boundary of the proposed site and is therefore within a desirable walking distance. Birmingham Business Park is a significant employment site and features a wide range of amenities including retail, food and health & fitness facilities.

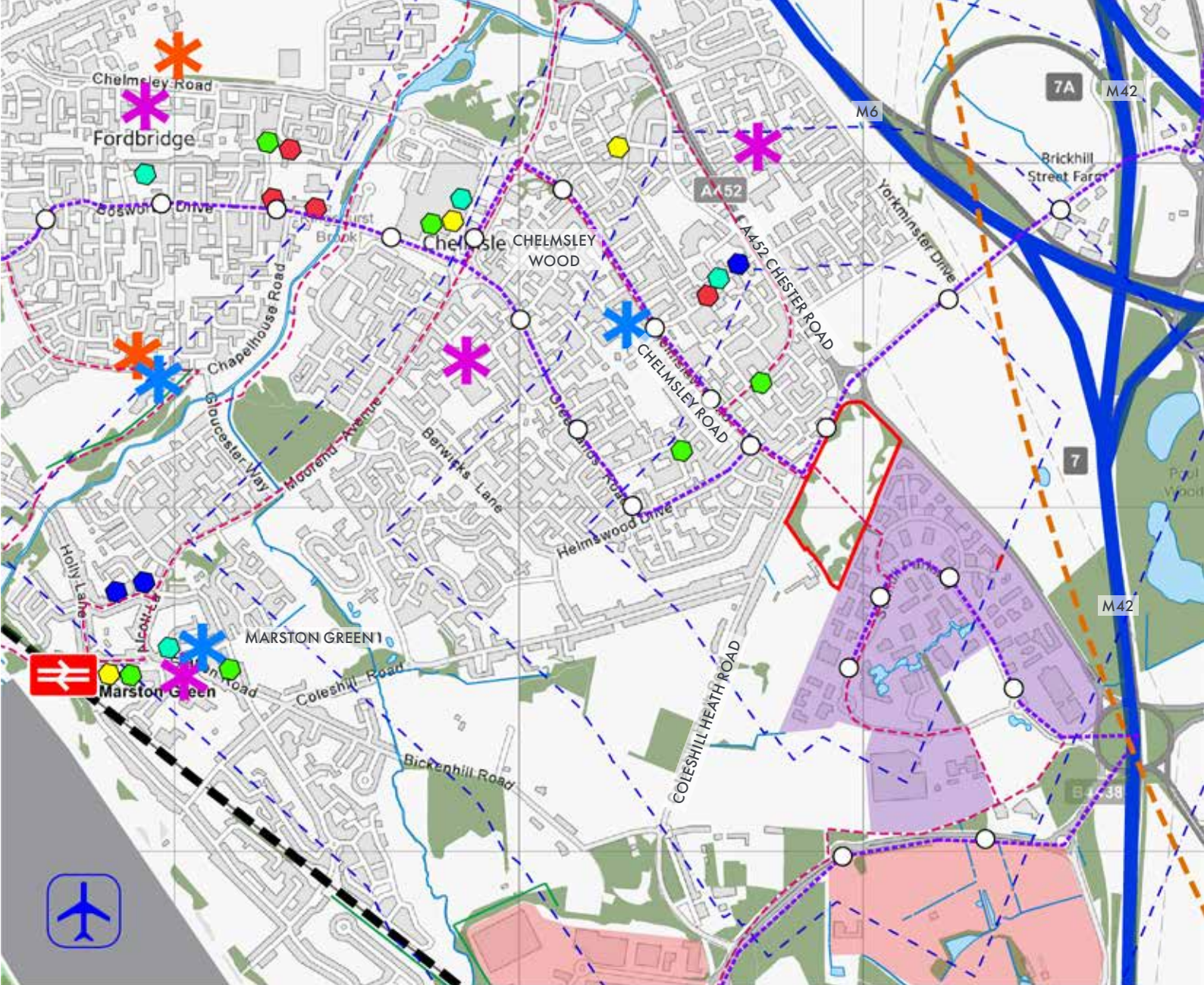
The Chelmsley Wood area to the west of the proposed site also includes Primary Schools, Hospitals and a Shopping Centre – amongst other facilities - all within 2km walking distance of the site.

Equipped play facilities are available at Bluebell Recreation Ground to the north of the site



Local convenience store at Dunster Road





Existing Local Facilities Plan

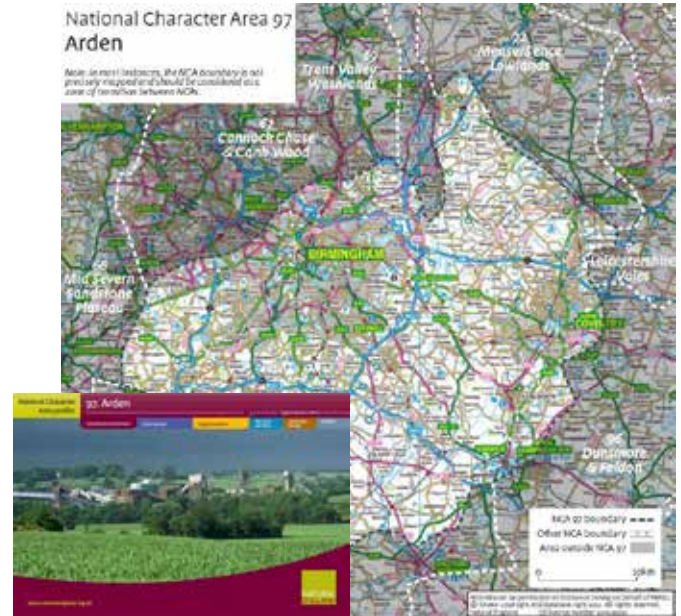


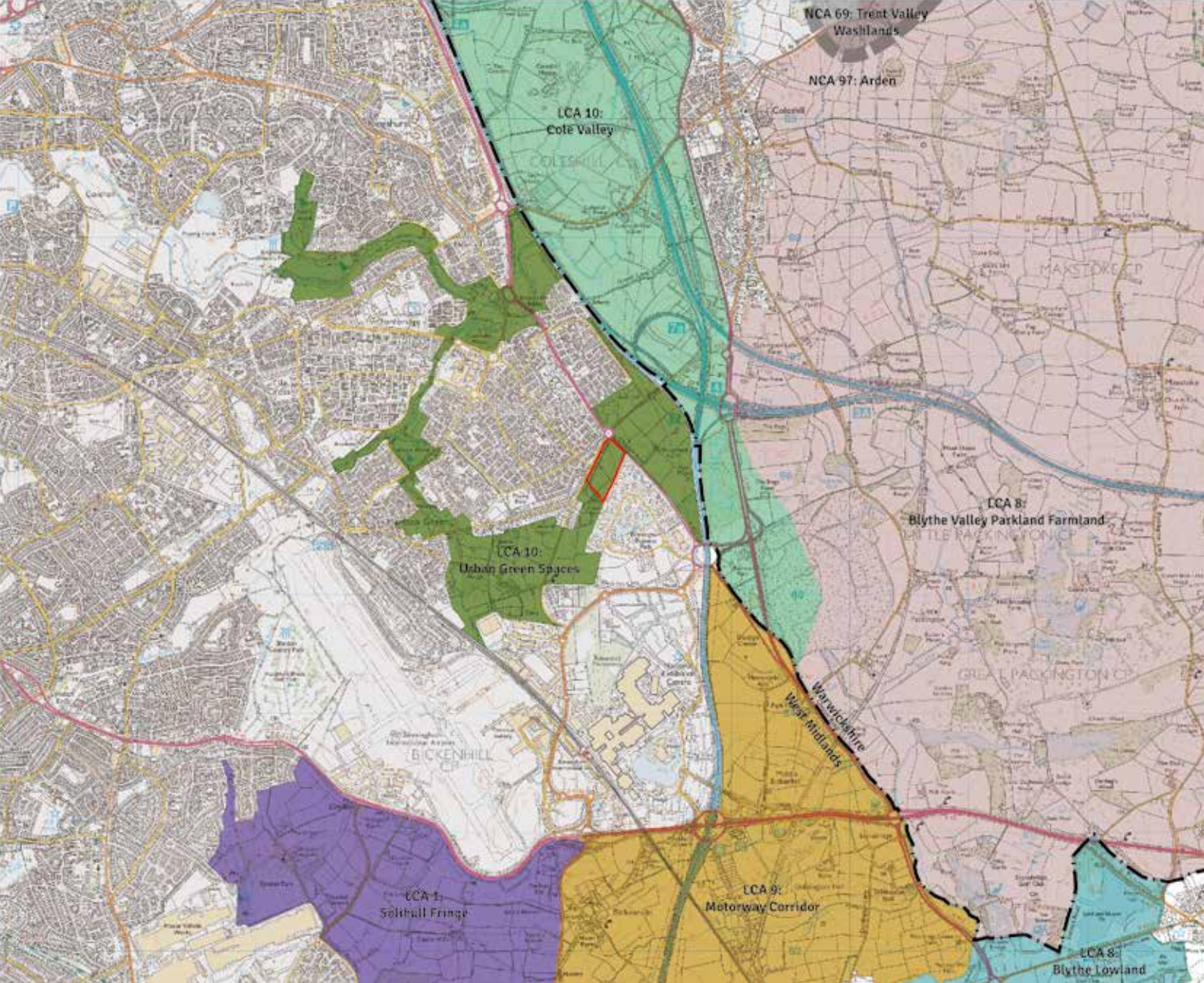
LANDSCAPE CHARACTER

National Character Area profile: NCA: 97 Arden

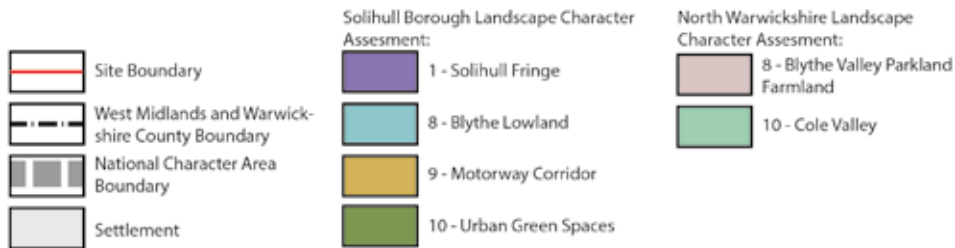
Landscape Character Assessment at a national level of study is recorded by Natural England (NE) within 159 National Character Areas (NCA) which informs the Landscape and Visual Appraisal (LVA) contained within the Vision Document. The site lies within the north-western part of National Character Area profile: NCA 97 Arden. Arden extends to a considerable area (143,425 ha). The site at just 0.19 ha exhibits a few of the key characteristics of the national NCA:

- Complex and contrasting settlement pattern with some densely populated areas where traditional settlements have amalgamated to form the major West Midlands conurbation while some settlements remain distinct and relatively well dispersed.
- The north-western area is dominated by urban development and associated urban edge landscapes.
- Mature oaks, mostly found within hedgerows, together with ancient woodlands, and plantation woodlands.
- Woodlands include historic coppice.
- Diverse field patterns, ranging from well hedged, irregular fields and small woodlands.
- Major transport corridors have a strong presence including: the M42, M40, M6 and M5.





National and Landscape Character Area Plan



Regional Landscape Character: Warwickshire Landscape Guidelines (1993)

At a County wide level of assessment, the Warwickshire Landscape Guidelines (Warwickshire County Council, 1993) divides the county into regional Landscape Character Areas. The site and its surroundings fall within the 'Arden' character area. The character area has been further divided into Landscape Types. The site is at the western edge of 'Arden Parkland' and the extensive urban areas of Solihull lie to the south and west of this Landscape Type.

The overall character and qualities of 'Arden Parklands' is described as an enclosed, gently rolling landscape, defined by woodland edges, parkland and belts of tree. The site exhibits some of these attributes.

Some of the key characteristic features of Arden Parklands include:

- Middle distance views enclosed by woodland edge.
- Belts of mature trees associated with estate lands.
- Many ancient woodlands, often with irregular outlines.
- Thick roadside hedges, often with bracken.

As part of the management strategy the county sets out objectives and guidelines to retain and enhance tree cover and wooded enclosure within the 'Arden Parkland' area.

Local Landscape Character: Solihull Borough Landscape Character Assessment (2016)

The Solihull Borough Landscape Character Assessment (SMBLCA) (Waterman, 2016) categorises the landscape of the borough into ten Landscape Character Areas (LCA). The site is within LCA 10: Urban Green Spaces. Some of the LCAs are further divided into sub-areas and the site is situated within Sub-Area 10B.

The SMBLCA describe LCA 10: Urban Green Spaces as an area comprising managed green spaces that include: parks, recreation grounds, sports fields, cemeteries, allotments and woodland. This is the landscape of the urban fringe where both urban and rural components influence the character of the place.



Extensive tree cover sets this area apart from the remaining urban area to the north east of Solihull. It also highlights that the landscape at the urban edge is sensitive to loss of tree cover and is important to the setting of the settlement and providing essential green connections to the countryside.

The southern part of LCA 10 is categorised as Sub-Area 10B which extends into the urban area of Solihull providing a series of green spaces. Towards the east of the sub-area along Coleshill Heath Road and closer to the M42 corridor, it tends to be busy and dominated by the impacts of the major transport infrastructure across the area. Key characteristics of the sub-area that are present within the site and surroundings include:

- Small pockets of deciduous woodland.
- High hedges along the roads with fast moving traffic towards the east.
- Strong tree cover in general across the sub-area.
- Green managed spaces, as a result of urban influences.
- Constant road and aeroplane noise form background disturbance within the sub-area, which is more prevalent to the eastern extent in contrast to the west.

The 2016 study suggests that sub-area 10B would be able to accommodate some areas of new development which would need to be of an appropriate type, scale and form, in keeping with the existing character and local distinctiveness of the area.

Landform of the Setting

Landform is a key component that shapes the landscape and character of the setting and for the site. The site has a locally even elevation ranging from 99m AOD to 101m AOD and its immediate surrounding is of a similar elevation.

Although the landform of the wider and even the local setting is rolling and occasionally hilly, the site has a near flat landform.

Land Use and Settlement Pattern

The centre of Solihull is approximately 7.5 km to the south west and settlement has grown and spread eastwards to encompass Sheldon, Marston Green and Chelmsley Wood. Birmingham International Airport is under 2km to the south west.

The M42 now forms something of the limit for settlement and a barrier to the east. The site has a clear and strong relationship with the settlement. The Birmingham Business Park lies immediately to the east of the site and its offices and buildings and car parks are perceivable from the site. Although the landscape of the site has clear limits, defined in places by tree cover, there is a strong sense of the settlement across the site. Noise, vehicle movement, glimpsed and filtered views of the urban area are all clear character drivers.

Much of the land outside of the built-up area in the site's vicinity is used for recreation. Agriculture, deciduous woodland and cemetery use also exist.

Tree Cover of the setting

The tree cover in this area is a key character driver for this area. Regular field pattern bound by hedgerows are a common feature in this area. In some places, denudation and part loss of hedgerows are evident, potentially to provide access, however a strong pattern is evident in the area. High hedges along the roads with fast moving traffic towards the east are also noted.

Small pockets of deciduous woodland scattered across this area including an Ancient Woodland further south. Tree cover is extensive and includes street trees, hedgerow trees, woodlands and trees within the parks.

In the immediate vicinity of the site, both Coleshill Heath Road and Chester Road are tree lined roads supplementing the extensive tree cover in the area. To the west of the site within Chelmsley Wood, trees are generally limited to private back gardens or front of the houses. To the east Birmingham Business Park has extensive tree cover, with trees in green spaces and lining the roads.

The Solihull Borough Landscape Character Assessment provides guidelines to protect and enhance this LCA including the following:

- Retain the offset and overlapping nature of woodlands and belts of trees.
- Encourage the enhancement of tree cover through the planting of new woodlands and belts of trees.
- Where new development is promoted the design and layout will require detailed consideration to make links with the adjoining landscape, in particular landform and vegetation pattern.

*Site Boundary to
Coleshill Heath Road*

*Grass covered spoil mounds
(on site)*

On-site: looking west towards the tree lined site boundary. Housing on Coleshill Heath Road is occasionally visible through the trees. The grass covered spoil mounds are clearly visible in this view.

The Site

*Housing on Coleshill Heath Road
(obscured by vegetation)*



4. OPPORTUNITIES AND CONSTRAINTS

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

A summary of these initial findings is set out below:

ACCESS AND HIGHWAYS

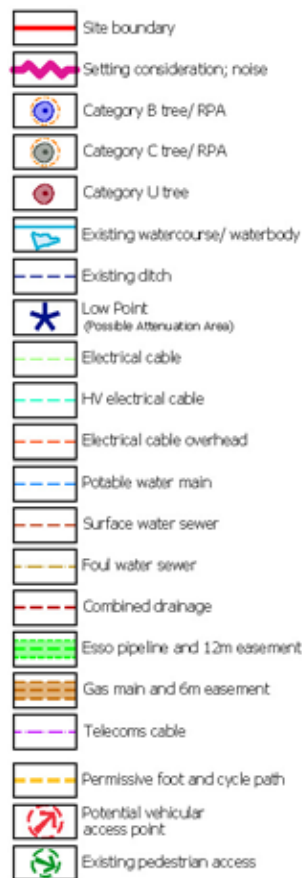
Vehicular access to the site will be taken from Coleshill Heath Road in the form of two priority junctions.

The site's walking and cycling infrastructure will tie in to the existing network in the vicinity of the site.

Emerging public transport infrastructure projects in East Birmingham have the potential to further enhance the site's accessibility by sustainable modes of transport.

The access location and design will take into account the bus lay-by on Coleshill Heath Road and the location of any mature trees, amongst other considerations.

The traffic impact of the scheme will be assessed, and the proposals will ensure that the proposed development of the site does not have an adverse affect on the operation of the local highway network.





CHELMSLEY ROAD

COLESHILL HEATH ROAD

A452 CHESTER ROAD

BIRMINGHAM BUSINESS PARK

FLOOD RISK AND DRAINAGE

The site is greenfield, mainly comprising informal park land and dense vegetation. A system of minor drainage ditches surround the site with a larger ditch crossing the site from south-east to north-west. A dry pond lies to the southern tip of the site and the Low Brook flows from east to west approximately 500m south of the site.

The site is located within Flood Zone 1 (low risk of fluvial and tidal flooding) and is at low risk of flooding from all sources.

Sustainable drainage systems shall be used throughout the development to provide amenity and biodiversity as well as mitigate against any pollution risk. Attenuated surface water flows are likely to discharge to the existing sewer in Chelmsley Road to the west of the site.

The closest appropriate public foul water sewer is located within Coleshill Heath Road to the west of the site. It is proposed to discharge all foul flows to this sewer and Severn Trent Water have confirmed through a Developer Enquiry that there will be no detrimental impact on the downstream network. The majority of the development shall drain foul flows via gravity, with an area in the north likely to require pumping through the provision of a new pumping station.

LAND CONTAMINATION

The site is considered to be developable and based on the anticipated ground conditions, a traditional foundation solution is likely to be suitable for the majority of the scheme. Limited potential sources of contamination have been identified, which would likely require straightforward mitigation measures, if necessary.

ECOLOGY

In summary, it is considered that the site does not present any significant 'in principle' ecological effects that could not be adequately mitigated as part of any future proposed development.

There are three sites of national importance within 5km, the closest of which are Coleshill and Bannerly Pools situated 0.6km east and the River Blythe situated 2.5km east, both of which are designated as Sites of Special Scientific Interest (SSSI). Based on the lack of ecological connectivity, the reasons for designation of the SSSI sites, their identified sensitivities, and the likely nature of any proposed future development at the site, no significant ecological effects are likely for either designated site.

There are no local wildlife sites or other non-statutory designated sites within the site

The site has potential to support protected/notable species, including: breeding birds; foraging and roosting bats; reptiles; notable mammals such as hedgehog and terrestrial invertebrates.

There is considerable potential for the design of development to enhance the condition of hedgerows and manage these sensitively for wildlife benefit.

Woodland will be retained and enhanced where possible, to provide wildlife corridors within and around the site.

AIR QUALITY

A review of Local Air Quality Management documents indicates that there are not currently any known air quality issues within the Borough and that consequently, no Air Quality Management Areas (AQMA) have been declared. A suitable mitigation strategy, proportionate to predicted development impact will be identified.

NOISE

Noise surveys have been undertaken at two locations at the proposed site, to enable assessment of sound levels against World Health Organisation and BS8233:2014 noise criteria, and to determine assist in specifying a suitable general noise mitigation strategy for the development.

The survey results and assessment show that sound levels in areas adjacent to the A452 and Coleshill Heath Road currently exceed the recommended noise criteria, which is not unusual for residential developments located adjacent to transport sources.

To attenuate sound levels to meet the relevant criteria, the general mitigation strategy will comprise of all, or a combination of, the following measures:

- Careful design of the site layout, so that buildings provide screening of noise sources to gardens.
- Acoustic barrier of approximately 2m height along the A452 boundary. Installation of acoustically sound garden fencing, where required.
- Specification and installation of suitably attenuated glazing and ventilation systems.

HERITAGE

No assets have been identified where the development of the site would have a potential effect on an assets setting.

No remains of archaeological interest are evidenced within the site and it is likely that this was open heath land prior to its enclosure for agriculture.

Evident disturbance to ground levels within the site is likely to have caused considerable disturbance to original ground levels.



Off-site: looking south-east towards the site from junction with the A452 (Chester Road) and Coleshill Heath Road.

UTILITIES

A summary of asset maps and perceivable services constraints are outlined in the table below:

Service and/or Provider	Existing Service Location
Foul Drainage (Severn Trent Water)	<p>Presence of a 150mm surface gravity sewer and 300mm foul water gravity sewer within the footway of Coleshill Heath Road.</p> <p>Further foul and surface water sewers within the footways/carriageways to supply the existing residential/commercial developments to the east and west of the proposed site.</p> <p>Diversions are not envisaged at this stage.</p>
Clean Water (Severn Trent Water)	<p>12” cast iron clean water main can be found within the eastern footway of Coleshill Heath Road which continues into Chester Road. Diversion/lowering of the clean water main in Coleshill Heath Road may be required to facilitate the site access.</p>
Gas (Cadent Gas)	<p>A medium pressure gas main crosses the site in a broadly east-west direction before continuing north along the eastern footway of Coleshill Heath Road. A gas governor is located outside the eastern site boundary to serve the business park to the east. This main requires a 3m easement either side of the pipeline (6m in total) before any development can take place. This pipeline has been accommodated as part of the masterplan.</p> <p>Further low-pressure gas mains within the footways/carriageways to supply the existing residential/commercial developments to the east and west of the proposed site. Diversion/lowering of the gas main in Coleshill Heath Road may be required to facilitate the site access.</p>
Electricity (WPD)	<p>A network of overhead and underground HV (11kV) cables within the confines of the development along with 2No. pole mounted transformers to serve existing Coleshill Heath Farm and a mast located on site. It is anticipated these cables will be diverted along the proposed footways/carriageways as part of the development proposals. The pole mounted transformer will be relocated and installed as ground mounted substations.</p> <p>Further HV (11kV and 33kV) cables found within the eastern footway of Coleshill Heath Road. Diversion/lowering of these cables may be required to facilitate the site access.</p>
Telecommunications (BT Openreach/Virgin Media/Zayo group)	<p>Underground BT cable found crossing the site from east to west in direction before continuing north on Coleshill Heath Road. This cable will be diverted as part of the development proposals.</p> <p>Virgin Media fibre optic cable and Zayo ducting within the western footway of Coleshill Heath Road. These cables are unlikely to be affected by the development proposals.</p>
ESSO Petroleum	<p>12” ESSO petroleum pipeline crosses the development in a north-south direction.</p> <p>The pipeline requires an easement of 6m either side (12m total) where no building is permitted, no raising or lowering of the existing ground level without the approval of ESSO and no tree planting can take place.</p> <p>This pipeline has been accommodated as part of the masterplan.</p>



Source: Google Street View

Off-site: looking south along Coleshill Heath Road along the boundary with the site.

Landscape of the Site

The site boundaries are well defined by Chester Road (A452) to the north, Birmingham Business Park to the east, a private lane leading to Heath Farm and the Heath Farm field hedgerow boundary to the south and Coleshill Heath Road to the west with existing residential beyond. To the north of the site beyond Chester Road lies arable fields providing a rural setting in juxtaposition to the urban setting of the other sides.

The site is well defined on its edges by extensive and prominent tree, hedgerow and scrub planting creating a buffer on all sides. Strategic gaps are noted breaking the tree edge to provide access into the site from the east, west and south. Due to the site's proximity to the A452, road noise is evident in the background generally within the northern part of the site which is characteristic of the area as mentioned within the Solihull Borough Landscape Character Assessment.

The site currently consists of two land parcels separated by the shared path running east to west connecting the residential area along Coleshill Heath Road to The Crescent in Birmingham Business Park. A strong line of hedgerow to the north of the shared path runs almost along its entire length. Connectivity between the northern and southern part of the site is limited to a central gap within the hedgerow along the shared path. Both land parcels have a similar character being a largely grassed area and used for recreational purposes.

Much of the tree cover on site are formed in either belts or in dense groups. The deciduous woodland within the south-western part of the site is noted within the National Forest Inventory and within the Priority Habitat Inventory. The tree belt to the east is set back from the Birmingham Business Park and a wide buffer tree planting present within the north-western corner near the roundabout. A few stand-alone trees

are present within the southern part of the site. Relatively new hedgerow planting to gap up a section of the existing hedgerow at the northern boundary along Chester Road has been undertaken. This part of the hedgerow does not have any tree cover within or to the south of it like the rest of the area.

Although, the surrounding area is generally flat, the site itself is undulating and has two substantial mounds one within each land parcel. This is an anomaly to the general character of the area and are potentially man-made features.

Views and Visual Amenity

Views off the site are restricted by the tree cover and visibility is fairly contained. Despite the mounds on site, the site has a strong visual containment.

The northern part of the site has dense boundary vegetation, and this severely limits views beyond. Views into the site around the boundaries are limited to gaps in vegetation and at the access points.

There are some limited views of the edge of Birmingham Business Park through the branches of the trees and gaps in vegetation, generally from the southern field area. Similarly, parts of Heath Farm are visible from the southern field through the gaps in vegetation.

Views to the residences along Coleshill Heath Road are afforded through the gaps in vegetation, although most of these views are heavily filtered by the branches of the trees and generally limited to the upper storeys or rooflines. These views are generally noted from the southern field and to the immediate north of the shared path.



Landscape and Visual Baseline Analysis Plan

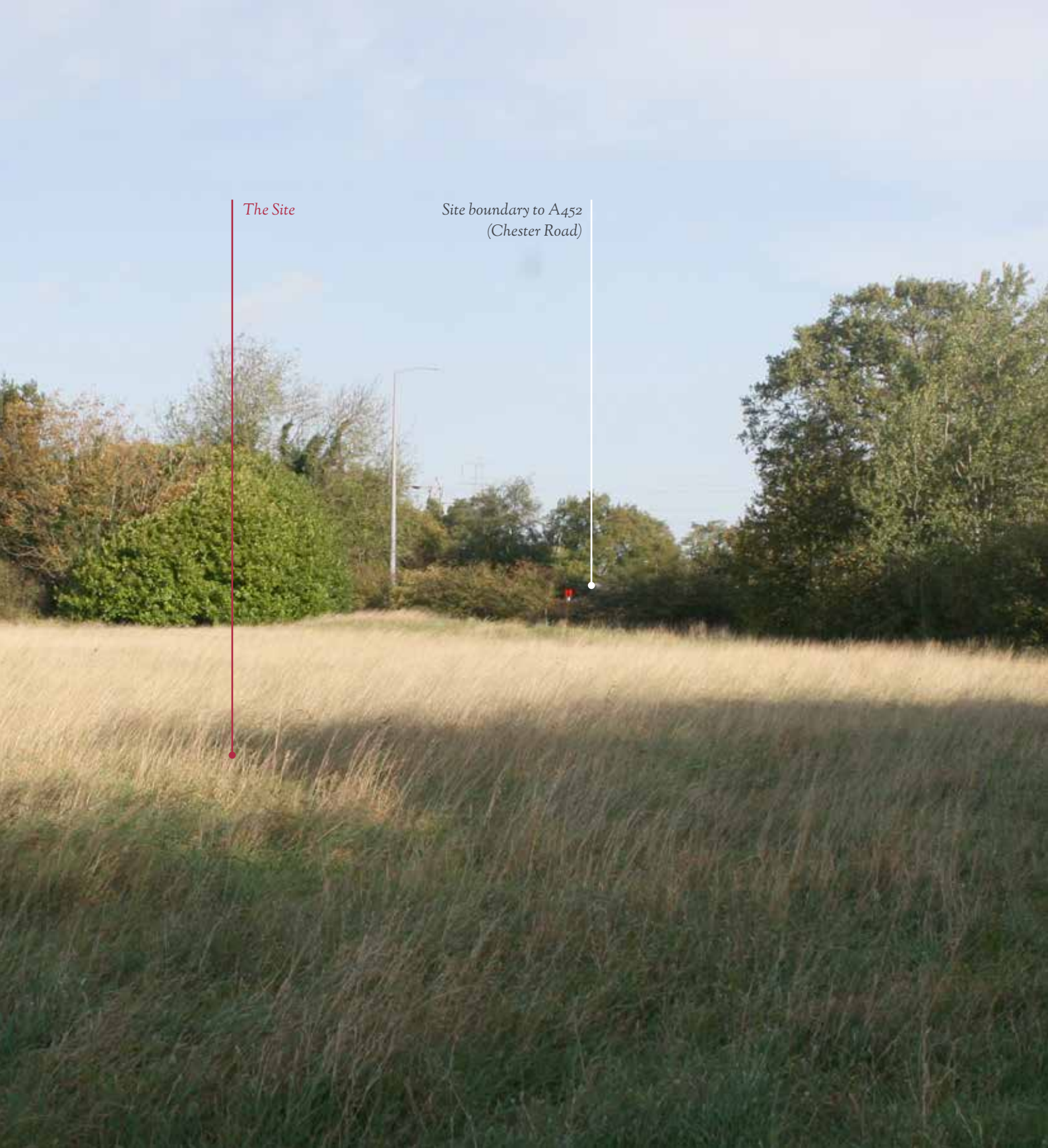


*Junction of A452 (Chester Road)
and Coleshill Heath Road
(obscured by trees)*

*On site: looking north west to the junction of the A452 (Chester Road) and
Coleshill Heath Road, obscured by the mature tree group on site.*

The Site

*Site boundary to A452
(Chester Road)*



5. DELIVERABILITY TRAJECTORY

Paragraph 35 of the NPPF sets out that Local Plans and spatial development strategies will be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and are therefore sound. Under this test, Plans are required to be ‘effective’ and therefore “deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.”¹

Furthermore, Paragraph 72 sets out that Local Planning Authorities should work “with the support of their communities, and other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”

To be considered deliverable, sites should offer a suitable location for development, be readily available and be achievable with a realistic prospect that new housing will be built within the first few years of the local plan period.

The technical analysis presented in the previous sections of this report have demonstrated that the site is highly deliverable inasmuch that there are no environmental constraints that would prevent the site being brought forward for development.

As demonstrated in the indicative sales trajectory set out below, the site is achievable and can be brought forward for development within the first five years of the emerging Local Plan.

Year	Market	Affordable ²	Total
2022/2023	12	6	18
2023/2024	24	12	36
2024/2025	24	12	36
2025/2026	30	15	45
Total	90	45	135

Importantly, the site is viable and will deliver the key community, social and physical infrastructure required to meet the needs of future residents, including affordable housing, formal and informal open space.

¹ Paragraph 35 (c) of the NPPF (2018)

² Policy P4: Meeting Housing Needs sets out affordable housing will be expected on residential sites of 11 dwellings or more. Contributions will be expected at 50% on each development site.



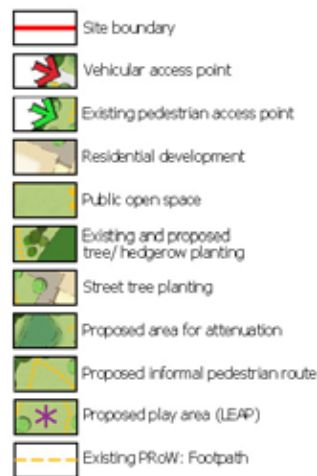
Off-site: looking east along Chelmsley Road into the site

6. CONCEPT MASTERPLAN

The Concept Masterplan, presented opposite, has been informed by the vision and site and local context analysis presented earlier in this Vision document, along with the following key design principles:

LAND USE AND DEVELOPMENT FROM

- Provision of approximately 3 Ha of net residential development, achieving up to 135 units at an average density of 45 dwellings per hectare (dph)
- Development will front onto Coleshill Heath Road, providing a positive frontage to complement the existing street scene.
- The use of a perimeter block development structure (with back to back gardens) will ensure that the development promotes the creation of a legible and permeable place.
- Development will front onto streets and spaces wherever possible, providing the opportunity for natural surveillance and encouraging active overlooking.
- Development is structured to reflect the built form of existing properties off Chelmsley Wood Road, and to ensure plentiful views to planting and open space, reinforcing a green character.





CHELMSLEY ROAD

COLESHILL HEATH ROAD

A452 CHESTER ROAD

BIRMINGHAM BUSINESS PARK

ACCESS AND MOVEMENT

- Vehicular access taken from Coleshill Heath Road to the east of the site.
- The existing permissive cycle path crossing the site will be retained in-situ as part of the proposals.
- A new network of informal pedestrian routes will be established within the site, responding to key desire lines and creating recreational circular walks that encourage physical activity.
- A hierarchy of streets is proposed, ensuring that the development is both legible, permeable and easy to navigate.

OPEN SPACE

- The proposals retain a large area of the site as accessible public open space. This offers the opportunity to significantly benefit the new and existing community through the provision of multifunctional green infrastructure with areas for formal and informal amenity open space.
- Existing green capital has guided the location of development within the site. Open space retains existing trees and hedgerows wherever possible, integrating them within a network of new green corridors.
- The proposals will maximise opportunities to retain and enhance biodiversity and habitat creation. The provision of Sustainable Drainage systems (SuDS), comprising of attenuation basins will help to achieve this and also manage surface water run off rates.
- Residential development is located to the west of the site. This enables the creation of a multifunctional and connected green infrastructure to be provided, with development benefiting from views to open space, and the retention of the existing structural planting to the west of the site.
- Easements to the Esso pipeline and gas main crossing the site are accommodated within areas of public open space
- Existing tree and hedgerow planting will be retained and enhanced wherever possible, creating a number of 'green corridors' that adjoin the boundaries of the site.
- Significant areas of accessible public open space are proposed to the west and west of the site, providing areas for formal play, attenuation, recreation, informal walks and existing/ new tree planting.



Off-site: looking north along Coleshill Heath Road. The permissive path that crosses the site to Birmingham Business park is visible on the right.

7. LANDSCAPE STRATEGY

The objective of the Landscape Strategy is to set the development into the host landscape in a manner that achieves a sympathetic and successful assimilation at the settlement edge.

There are three key objectives for Landscape Strategy:

- to make an important contribution to integrating the development with the host landscape of the immediate setting;
- to create a public asset of attractive green space to serve the needs of the development; and
- to ensure the effects of the development are limited and contained in a manner that makes an attractive and effective new edge to the settlement.

Existing components: the shared path, hedgerow and trees, would form the structure of the new Green Infrastructure (GI). There would be other green spaces in addition to the existing planted edges and supplemented further by Sustainable Drainage systems (SuDs). These green and blue spaces along with the existing components would form a network of biodiverse linked spaces and habitats within the site and would also provide linkage to other GI assets beyond the site. The retained woodland and other components would be enhanced by setting them in areas of public green space, forming a loop around the site.



On-site: looking west along the foot and cycle path towards the crossing on Coleshill Heath Road.



Landscape Strategy Plan

Existing Components

-  Site Boundary
-  Countryside
-  Settlement
-  Public Green Space

Proposed Components

-  Shared Cycle and Pedestrian Route
-  Roads
- Vegetation**
 -  Tree Cover
 -  Field Trees
-  Development Area
-  Attenuation Ponds
-  Development Entrance with green planting
-  Green links into site

The Landscape Strategy has at this early stage of conceptual development design work, been identified by Landscape and Visual Appraisal work that is set out in this document. Landscape Character at national, regional and local levels have informed the understanding of the site and its relationship to the countryside and settlement. It has been recognised that the visual containment of the site is a key characteristic and would be important to retain this aspect of the site and potentially enhance the sense of concealment with additional tree planting where appropriate.

The SuDs will require basins to be created to attenuate rainwater. These features have been located to serve drainage operational requirements. They also have a biodiversity role as well as providing an enhancement to the development. They will be designed, planted and managed in a manner that serves as a public amenity. A publicly accessible landscape will be created that makes attractive links for residents with the existing settlement to the west including the Kingfisher Country Park and Coles Valley Way, a long-distance path.

Wildlife enrichment and the safeguarding and future management of potential habitats that will be improved for both existing and future additional species, will also be an aspiration for the development proposals.





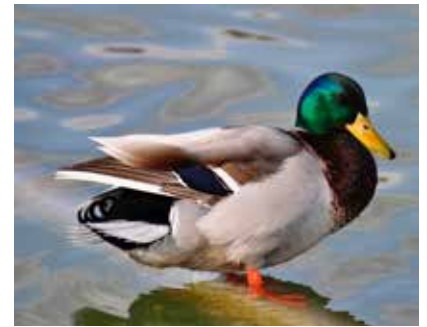
CHELMSELEY ROAD

COLESHILL HEATH ROAD

A452 CHESTER ROAD

BIRMINGHAM BUSINESS PARK





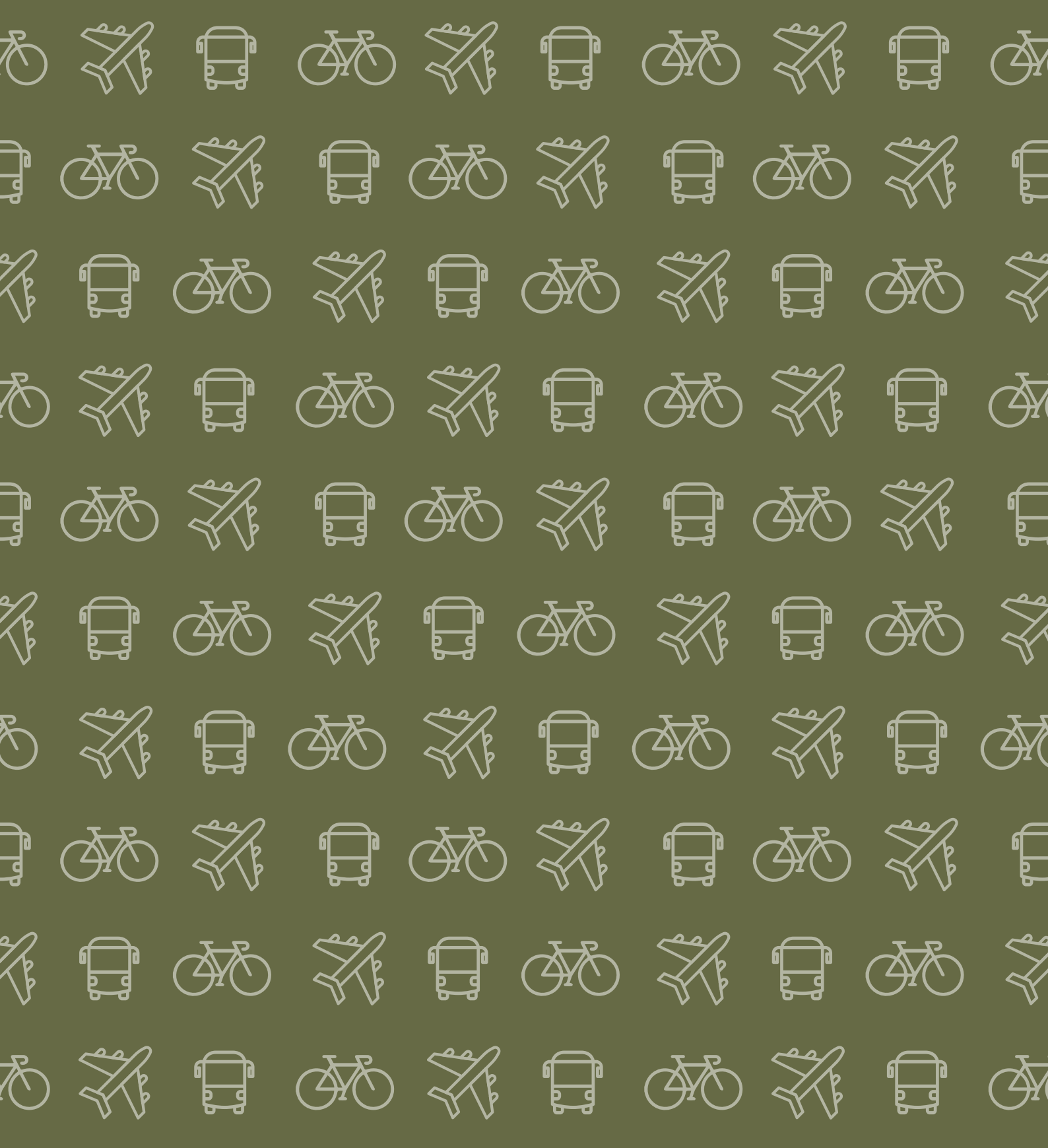
8. SUMMARY OF ASPIRATIONS



This vision document has set out a vision for the site, a summary of technical assessments undertaken to date and the emerging concept proposals for Land east of Coleshill Heath Road, Birmingham.

In summary the proposals will deliver the following key benefits and qualities:

- A desirable high quality and distinctive scheme, that benefits from easy access to local facilities, delivering around 135 dwellings.
- An attractive, safe and legible place that will have a site specific identity and character, responding to positive elements of the surrounding built form.
- An accessible development, benefiting from the sites excellent location, with plentiful connections to sustainable transport choices.
- Significant areas of publicly accessible open space, providing areas for formal and informal play, benefiting both existing and proposed communities, as well as enhancing biodiversity and ecology.



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