

Policy and Delivery
Managed Growth and Community Directorate
Solihull MBC Council House
Manor Square
Solihull
B91 3QB

Date: 14 March 2019

Our ref: 60598/01/JK/HPI/17244062v1

Your ref:

Dear Sir/Madam

Solihull Draft Local Plan Review Supplementary Consultation (January 2019)

On behalf of our client St Philips Land Ltd ('St Philips'), we wish to make representation to the consultation on the Solihull Draft Local Plan Supplementary Consultation (January 2019), responding specifically to Question 1, 20, 36 and 44.

We would also like to propose the removal of land at Aylesbury Road from the washed over Green Belt and which we consider represents a logical limited strategic extension to Hockley Heath. The site, under the control of St Philips, is situated at Stratford Road, Hockley Heath, and forms part of a proposed wider development site including land within both Warwick District Council and Solihull Metropolitan Borough Council.

St Philips has prepared a Vision Document, submitted alongside this representation to assist in the promotion of part of the overall site through the Solihull Local Plan Review. In preparing the document, St Philips has appointed a team of expert technical consultants who have analysed the physical environment and technical suitability of the site. The team has prepared detailed technical evidence to demonstrate which has enabled the informed evolution of the Vision Document and in order to demonstrate that the site is deliverable and that there would be no showstoppers to development.

This representation is made therefore, in response to the Draft Local Plan and in particular with regard to the "soundness" of the draft policies and allocations set out. The response is made on the basis that the land at Aylesbury Road represents a logical and justifiable opportunity for development, taking into account the known constraints and evidence base, when compared to alternative allocations for residential development considered through the Draft Local Plan.

Site Context

Hockley Heath is located to the south west of the parcels and contains a number of local facilities. To the north east of the site separated by intervening countryside is Dorridge.

The wider site comprises approximately 46ha of land to the north east of Hockley Heath, bordered by Stratford Road to the west, Box Trees to the north and Aylesbury Road to the south. The land within SMBC's domain totals approximately 1.7ha. Applying a density of 22dph, the site could deliver approximately 37

units. The remainder of the site falls within Warwick District Council and will be promoted through a subsequent review of the Warwick Local Plan and which would deliver a combined total of circa 317 dwellings.

Overall, the proposals will allow the initial release of land for around 37 dwellings within Solihull on land lying immediately to the east of Aylesbury Road and which would allow small urban extension to the settlement. This would be followed by the cross-boundary promotion of land for a comprehensive sustainable urban extension of the remainder of the site which lies within Warwick District.

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?

St Philips do not believe there are exceptional circumstances that would justify the Council using an alternative approach, but nonetheless consider the Council have not appropriately addressed the requirement to contribute to the unmet need of the wider HMA.

The use of the Standard Methodology in determining the Local Housing Need figure is welcomed, as is the use of 2014-based household projections following the Government consultation in October 2018 and formal response in February 2019, including update to the PPG.

Fulfilling the Duty to Cooperate will require the Borough Council to reach agreement with the other authorities throughout the HMA on how it can assist in accommodating an appropriate portion of the unmet housing needs from across the HMA (as identified in the Greater Birmingham HMA Strategic Growth Study, February 2018).

At paragraph 49 of the Draft Local Plan Supplementary Consultation document, the Council reiterates its commitment to accommodate 2,000 dwellings from the shortfall of the wider HMA, as outlined in the 2016 Draft Local Plan. It is suggested that the Council has been working with its partners to reach a consensus, however there is no public record of such discussions.

There is evidence, however, that there is not agreement amongst the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) authorities regarding the level of growth with at least one, North Warwickshire Borough Council, in the process of raising concern based upon the position statement included at Appendix B.

St Philips are concerned about the lack of clarity over the mechanism to agree upon how the unmet HMA housing needs are going to be distributed and delivered.

As set out throughout our responses, there are strong grounds to suggest that Solihull Borough is well placed to deliver a greater portion of the unmet needs and this should be provided for through the Local Plan Review.

Unless this is achieved, it is highly likely that the Draft Local Plan will be found unsound and that the Duty to Cooperate will not be met. Procrastination on this issue will delay the preparation of other Local Plans resulting in housing needs being unmet, which will have significant adverse impacts across the HMA and risks stifling economic growth.

Question 20: Do you believe that Site 25 land south of School Road should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

Whilst we appreciate the proposed site has not been tested against the Accessibility Study and Green Belt Assessment, we consider its suitability can be compared with the scoring of site 38 given its proximity. In this context, site 38 is considered medium/high in accessibility and identified as a lower performing parcel in terms of Green Belt with a combined score of 5, as outlined on the below table. However, the Site Assessment Commentary notes that ‘it would be difficult to establish a logical and defensible Green Belt boundary.’

Site Name	Land south of School Road	Ashford Manor Farm
Site Reference	139	38
Accessibility Study Overall Score	Medium/High	Medium/High
Green Belt Assessment Combined Score	5	5
Site Selection Step 1	6	6
Site Selection Step 2	G	R

By contrast, St Philips consider their land benefits from similar accessibility and lower Green Belt performance but can offer a more logical and defensible Green Belt boundary. Given the self-contained nature of their site which is bound by permanent physical features, encroachment into the wider countryside would be prevented.

As a result, it is considered that the land within Solihull should be identified for removal from the Green Belt and should be identified as a strategic allocation within the Local Plan for 37 dwellings.

Question 36: Are there any other areas of the Borough where washed over status should be reviewed, if so which areas and why?

St Philips consider that the land at Aylesbury Road should be removed from the Green Belt and subsequently allocated for development through the Local Plan Review in order to meet the future housing needs of the settlement.

Removal from Green Belt

The land within Solihull Borough would form a logical extension to the settlement of Hockley Heath. The site is modest in size and is bound by permanent physical features in all directions which would ensure development of the wider site remains contained and has negligible impact on the remaining Green Belt.

There is existing development to the south of the site in the form of residential properties that form ribbon development along Aylesbury Road and Stratford Road. The proposed development will not extend beyond the limits of this current development, and will provide visual buffer planting along the northern site edge to create a defensible boundary.

Given the permanent physical features to all the boundaries of the site, it is considered that removal of the site from the Green Belt would not result in unrestricted urban sprawl of large built up areas. Furthermore, Hockley Heath is not considered to be a large built-up area in the context of the original designation of the West Midlands Metropolitan Green Belt.

The nearest neighbouring settlement to the site and Hockley Heath is Dorridge to the north east. Although the development would extend Hockley Heath in this direction, the permanent physical features bounding the site, as previously described, would not cause the gap between Dorridge and Hockley Heath to be adversely compromised. We therefore consider that development of the wider site would not cause neighbouring towns to merge into one another.

The development of the wider site would be a natural extension to the existing built-up area of Hockley Heath and is contained by permanent physical features, which have already been highlighted. These features would prevent encroachment into the wider countryside. Additionally, the extent of countryside already surrounding the wider site is considered to be robust, and which would not be adversely affected by the development of the wider site. The development of the site would not, therefore, contravene the Green Belt purpose of safeguarding the countryside from encroachment or creating urban sprawl.

The Vision Document submitted through the Call for Sites process and supporting this representation has examined in full the spatial relationship of the land at Aylesbury Road and the contribution made to the five purposes of Green Belt. It is demonstrated that the release of the site from the Green Belt in Solihull would be logical and would not result in overall harm to the purposes of Green Belt.

Question 44: Are there any other comments you wish to make on the Draft Local Plan Supplementary Consultation?

The use of standard methodology in determining the Local Housing Need figure is welcomed, as is the use of 2014-based household projections following the Government consultation in October 2018.

Fulfilling the Duty to Cooperate will require the Borough Council to reach agreement with the other authorities throughout the HMA on how it can assist in accommodating an appropriate portion of the unmet housing needs from across the HMA (as identified in the Greater Birmingham HMA Strategic Growth Study, February 2018).

At paragraph 49 of the Draft Local Plan Supplementary Consultation document, the Council reiterates its commitment to accommodate 2,000 dwellings from the shortfall of the wider HMA, as outlined in the 2016 Draft Local Plan. It is suggested that the Council has been working with its partners to reach a consensus, however there is no public record of such discussions.

We make reference to responses from North Warwickshire Borough Council dated 22/1/16 and Coventry City Council dated 17/2/17 to the Council's Draft Local Plan consultation in 2016. Both authorities raise concern over how Solihull are addressing their contribution to the HMA shortfall.

There is evidence, however, that there is not agreement amongst the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) authorities regarding the level of growth. Whilst a position statement published in September 2018 confirms joint working, it has not to date demonstrated any commitment to the distribution of growth to individual local authorities.

St Philips, therefore, are concerned about the lack of clarity over the mechanism to agree upon how the unmet HMA housing needs are going to be distributed and delivered.

Unless this is achieved, it is highly likely that the Draft Local Plan will be found unsound and that the Duty to Cooperate will not be met. Procrastination on this issue will delay the preparation of other Local Plans resulting in housing needs being unmet, which will have significant adverse impacts across the HMA and risks stifling economic growth.

We trust that the above comments will be considered during the review of the Draft Local Plan. We and St Philips would be happy to discuss the points raised in this letter further with Solihull Officers. If you have any queries, please do not hesitate to contact me.

Yours sincerely/faithfully



Jon Kirby
Senior Director

Copy Rebecca Birch, St Philips Land Ltd

Appendix A: Vision Document