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Solihull Local Plan Supplementary Consultation - March 2019 FINAL



Michael Davies

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Dear Gary,

**Representations to the Solihull Draft Local Plan Review Supplementary Consultation
Land at Dickens Heath Road, Tidbury Green**

We have prepared the following submission in response to the Solihull Draft Local Plan Review Supplementary Consultation, on behalf of Bloor Homes. Bloor Homes is promoting land between Dickens Heath and Tidbury Green for residential development.

We have presented the context of the site below with further details on how the site could deliver a sustainable residential opportunity set out in the accompanying promotion document which forms part of these representations. The submission includes our response to the following questions which are specified in the Solihull Supplementary Consultation document:

- Question 1
- Question 2
- Question 12
- Question 34
- Question 39
- Question 40
- Question 41
- Question 42

Site Context

Bloor Homes is promoting land to the east of Tidbury Green and west of Dickens Heath that has a total gross area of 15.2 hectares (37.5 acres). Arable Farmland adjoins to the North and South and low-density residential dwellings adjoin to the west, south west and south east. The site is bounded by Dickens Heath Road to the south, Tilehouse Lane to the west and Birchy Leasowes Lane to the north.

Bloor Homes land is located in the Green Belt and is not currently proposed for release from the Green Belt through the emerging Solihull Local Plan Review. However, we consider that the site is suitable for Green Belt release to complement the proposed release of land to the north being promoted by Richborough Estates; to enable the delivery of a comprehensive development, linking north towards Whitlock's End Train Station. We have attached a plan to this submission response providing further context (Appendix A).

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Local Plan Review Consultation Responses

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?

We acknowledge that the Draft Local Supplementary Consultation is not seeking views regarding the contribution that the Council is making towards the Housing Market Area ('HMA') shortfall and will be dealt with at the Regulation 19 Pre-Submission stage.

We do not believe that there are exceptional circumstances that would justify the Council using an alternative approach.

We have considered the Housing Requirements and Current Land Supply in Solihull's Draft Local Plan Supplementary Consultation Document. We acknowledge Paragraph 32 which states that the Strategic Housing Market Assessment ('SHMA') established that the Objectively Assessed Need ('OAN') for the Borough was 13,092 new dwellings over the period 2014 to 2033 which equates to 689 dwellings per year. However, to provide a contribution to the Greater Birmingham housing shortfall, the SHMA set the housing requirement at 15,029 new dwellings (791 dwellings per annum); providing a contribution of 1938 dwellings to GBHMA.

We acknowledge that the introduction of the new standard methodology uses the latest household projections and then applies a percentage increase to them based on a formula that uses a local affordability ratio. The Government's technical consultation on Updates to National Planning Policy and Guidance in October 2018 indicated that the council should revert to the 2014 based household projections for standard methodology projections for standard methodology calculations in order to establish a Local Housing Need ('LHN') figure. We **support** paragraph 40 in the Supplementary Preferred Options document which states that the Council will use the 2014 based household projections in their LHN calculations.

We note that the Council has used 2018 as the base year and calculates the annual requirement for LHN for Solihull to be 621 dwellings per year, using the 2014 based household projections. Using the latest affordability ratios which were published in April 2018, Solihull's percentage increase is 23.6% which results in an LHN figure of 767 dwellings per annum. As this is Solihull's LHN figure, this results in a contribution of only 24 dwellings per annum to the GBHMA. We consider that this contribution will not be sufficient to meet the housing shortfall.

In addition, the third step of the standard methodology is the potential application of a cap; which limits the increase in the minimum annual housing figure by capping the LHN. Solihull's resultant cap would be set at 40% increase from 621 dwellings per year which results in a cap of 869 dwellings per year. We consider the application of a cap prior to agreeing how the HMA shortfall will be met to be counterintuitive as the Ministry of Housing, Communities and Local Government ('MHCLG') seeks to boost the supply of housing. Paragraph 49 of the Supplementary Documents states that the Draft Local Plan included a commitment to accommodate 2,000 dwellings to aid the GBHMA. However, when using the same contribution, and applying the standard methodology, this would equate to housing target of 885 dwellings: 16 dwellings over the cap (if the cap is applied). We consider that Solihull should not apply a cap to its housing requirement. We consider that further consideration is required on how the application of the standard methodology relates to a local authorities housing need when they are picking up the shortfall for an adjacent authority i.e. Greater Birmingham.

The MHCLG published the Housing Delivery Test on 19th February 2019, alongside the updated NPPF. The housing delivery test calculates the 'housing need' for local authorities by calculating the number of homes required over the three year period and adjusted net additions over the same period.

We consider that the figures are used to incentivise local authorities to drive up housing delivery with a "presumption in favour of sustainable development". The government deems 95% delivery of assessed need as the pass rate. Councils that deliver between 85% and 95% of assessed need must develop an action plan,

while those that deliver between 25% and 85% must identify 20% more land for development than originally required in the five-year supply included in Local Plans. Solihull’s published housing delivery score is 109% as shown below:

| Number of Homes Required | | | |
|---|---------|---------|--------------------------------|
| 2015-16 | 2016-17 | 2017-18 | Total number of homes required |
| 616 | 623 | 610 | 1,849 |
| Number of homes delivered | | | |
| 2015-16 | 2016-17 | 2017-18 | Total number of homes required |
| 711 | 547 | 751 | 2,009 |
| Housing Delivery Test: 2018 measurement | | | 109% |
| Housing Delivery Test: 2018 consequence | | | None |

The figure of 109% indicates that no action is required. However, the MHCLG is committed to boosting the supply of housing and although the housing delivery test score indicates no action is required we consider that assessed need housing numbers should be seen as minima.

Furthermore, as set out in para 3.7, Solihull Council, under the Duty to Cooperate, must assist neighbouring authorities to meet needs of the Greater Birmingham HMA. The current draft Local Plan Supplementary Consultation (para 29) makes it clear that a further consultation on the GBHMA housing numbers will be undertaken at the submission stage which is expected to take place in summer 2019. We consider that the Land at Dickens Heath Road could aid Solihull in meeting its own housing needs as well as providing a contribution to the GBHMA housing shortfall.

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

We object to the scoring our client’s site has received in the Site Assessment document (January 2019). The site has been categorised as a Priority 9 site, which refines it as a red site in the second step of refinement. We do not support the Step 2 ‘refining criteria’ which are listed on page 19 of the Supplementary Document and the lack of clarity of how sites have been assessed against the factor listed in the table. We have also analysed other parcels that surround our client’s site and consider that this methodology of site selection has been inconsistently applied.

Site 41 is located to the north of our clients land and immediately borders Richborough Estates proposed allocation to the south and the urban area of Shirley to north. Despite containing hard and soft constraints, high landscape character sensitivity, a ‘medium’ accessibility core and being allocated a Priority 7 score, the site has been scored ‘green’ and therefore is deemed to be included in the plan as an intended allocation. The justification Solihull provides is that ‘the site is an accessible location so justifies some release of Green Belt, but extent needs to be limited so that sufficient gap is retained between urban area and Dickens Heath’. As this site adjoins Dickens Heath to the south, Richborough Estates to the south and the urban area of Shirley to the north, we disagree with Solihull’s justification.

We consider that as Richborough Estates site is included in the Draft Concept Masterplans Document (January 2019), site 41 will be bordered on three sides by residential development so a sufficient gap will not be retained. As our clients land borders Richborough Estates to the north, has no hard constraints and as a high accessibility score, we consider that the site at Land at Dickens Heath Road should be viewed in the same context as Site 41 and should therefore have been assessed as a ‘green’ site and allocated for residential development.

Paragraph 72 in the Supplementary Document states that a ‘red’ site will not be included in the plan, as the development of the site has severe or widespread impacts that are not outweighed by the benefits of the proposal. As well as the above, we consider our client’s site has many benefits that outweighs the harm of removing it from the Green Belt.

With reference to paragraphs 133, 134 and 137 of the NPPF 2019, we set out below the exceptional circumstances we consider to outweigh the harm that is considered to be caused by Green Belt, in relation to our clients land at Dickens Heath, Tidbury Green.

| Exceptional Circumstance | Summary |
|--|---|
| <p>Greater Birmingham Housing Market Area ('GBHMA')</p> | <p>The Birmingham Development Plan adopted in January 2017 identified an unmet need of 37,900 dwellings for the plan period 2011-2031. The GBHMA commissioned a Strategic Growth Study that was published in February 2018 which identified an outstanding minimum shortfall of 28,150 to 2031 and 60,900 homes to 2036. As this is a minimum shortfall, it is expected that more houses may need to be accommodated across the HMA.</p> <p>In accordance with paragraph 24 of the NPPF, local planning authorities “are under a duty to cooperate with each other, and with other subscribed bodies, on strategic matters that cross administrative boundaries”. In light of this, neighbouring authorities within the GBHMA, such as Solihull, will be expected to accommodate additional housing in order to address the housing shortfall. A Statement of Common Ground has yet to be signed but it is understood that the GBHMA authorities are working together to accommodate the housing shortfall across boundaries.</p> <p>We consider that there are exceptional circumstance which can justify changes to Green Belt boundaries within Solihull and the other GBHMA authorities. Therefore, we consider that there are exceptional circumstances that justify the release of land at Tidbury Green, Solihull.</p> |
| <p>Sustainable Development</p> | <p>Our clients land is located between Tidbury Green and Dickens Heath. Dickens Heath provides a wide range of community facilities including a two-form entry primary school, library, GP surgery, shops and services. Tidbury Green Primary School has also been expanded to provide additional capacity for pupils arising from new residential developments at Tidbury Green Farm and Lowbrook Farm.</p> <p>We consider that Land at Dickens Heath Road can connect Tidbury Green Primary School with the land being promoted by Richborough Estates to the north and can link directly through this proposed development to Whitlocks Road Railway Station which lies approximately 0.32km from this site and offers a regular service to Birmingham Moor Street (every 20 minutes).</p> |
| <p>Affordable Housing</p> | <p>We consider that the release of Green Belt for the delivery of housing will also significantly boost the supply of affordable housing. The adopted Solihull Local Plan requires sites of 0.2 hectares or more, or housing developments of 3 or more (net) homes to meet the housing needs of the Borough. Contributions will be expected to be made in the form of 40% affordable dwelling units on each development site, but will take into account: site size, accessibility to local services and facilities; the economics of provision; whether the provision of affordable housing would prejudice the realisation of other planning objectives; the need to secure a range of house types and sizes and; the need to achieve a successful housing development</p> |
| <p>The ability to deliver a comprehensive development</p> | <p>The site is bound to the north by a potential allocation of residential development, which is being promoted by Richborough Estates. Richborough’s 41ha site is currently in the Green Belt and if the site is allocated it will accommodate 700 homes over the plan period.</p> |

| | |
|--|---|
| | We consider this provides further evidence that Land at Dickens Heath Road, will have a completely different position in the Green Belt. We also consider that the delivery of Land at Dickens Heath Road will also promote a comprehensive development to take place in the area, as the site is surrounded by existing or proposed development on all sides |
| Contributions to Community Facilities | Land at Dickens Heath Road, Tidbury Green will provide contributions towards community facilities, such as education and health facilities. This will ensure that improvements to existing local community facilities are provided to deliver public benefits. |
| Economic and Environmental Benefits | We consider that the release of Land at Dickens Heath Road from the Green Belt would provide an increase in support to existing shops and services which will in-turn contribute to the vitality and viability of uses within the existing urban area. In addition to the site being unconstrained by significant environmental features, the site will provide a range of infrastructure which will improve the environmental quality of the site. |

We consider that individually these matters are very significant and taken together these benefits outweigh the harm such as inappropriate development. Therefore, we consider that our clients land is in a suitable location for development of housing to meet the needs of Solihull and the GBHMA and should be taken forward as a 'green' site and allocated for residential development in Solihull's Local Plan Review.

Question 12: Do you believe that Site 4 Land West of Dickens Heath should be included as an allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

As mentioned in our response to Question 2, we support the inclusion of Site 4 West of Dickens Heath (Richborough Estates) as an allocated site for residential development. We acknowledge Paragraph 150 in the Supplementary Document and consider that although located in a moderately performing parcel of Green Belt, the site is opportunely located in very close proximity to Whitlock's End Train Station as well as being within walking distance to key facilities and services to make it sustainable.

However, we consider it is unclear how this site (parcels 176 and 126) in the Site Assessment Document are 'green sites' when our client's immediately adjacent site has been scored 'red'. We seek further clarification from the Council on this matter.

Similarly to our clients site (192), Site 4 Land West of Dickens Heath is located in both medium and highly performing Green Belt parcels, has hard and soft constraints (our clients site has no hard constraints) and scores favourably in terms of site accessibility. Solihull Council's justification is that Dickens Heath is identified as a suitable settlement for significant growth. We consider that as our client's site borders Dickens Heath to the east, it should also be scored 'green' and allocated for residential development.

The Site Assessment document also states that Site 4 Land West of Dickens Heath should encourage pedestrian and cycling connectivity though the site, in particular to Dickens Heath Village and Whitlocks End Train Station. We consider that our client's site provides Solihull with an opportunity to deliver a more comprehensive development with Richborough's land to the north, which would enhance connectivity and permeability to key facilities such as the primary school. As well as aiding Solihull to achieve its LHN and GBHMA shortfall, our clients site is situated to the west of Dickens Heath, which is identified as a settlement that is suitable for significant growth.

Question 34. Should the washed over Green Belt status of these settlements / areas be removed, and if so what should the new boundaries be? If not why do you think the washed over status of the settlement should remain?

We support the removal of the Green Belt wash from Tidbury Green. As a minimum it will provide opportunities to deliver additional development and make better use of land which is currently constrained. We also support the Council's recognition (paragraph 378) that Tidbury Green is one of five settlements that "does not have an open character that makes a contribution to the openness of the Green Belt". With this revised approach to Green Belt wash and the proposed allocation north of Tidbury Green, we consider that the Council should revisit the strategic position that Tidbury Green holds in terms of supporting future housing growth and the opportunity to sustainably connect the settlement to Whitlocks End station via the Richborough allocation (site 4 West of Dickens Heath). A strategic allocation and a removal of Green Belt wash should then determine the exact boundary revisions that should be made to the settlement boundary. We welcome the opportunity of discussing the detail of the proposed settlement boundary review further with the Council, using the landscape and Green Belt evidence we have prepared in support of these representations.

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

As stated in our response to Question 2 and Question 12, we consider the Site 192 in the Site Assessment document should be a 'green site' and allocated for residential development.

We consider that the site being promoted by Bloor (site 192) performs better in some areas than Site 41 and is located in an area identified as being an area suitable for significant growth. We consider that our client's site has many benefits, as shown above, that outweighs the harm, arising from inappropriate development. Bloor's site has no hard constraints, limited soft constraints, and provides Solihull with an opportunity to deliver a comprehensive development in this area. We consider that the Railway line to the west of Tidbury Green could provide a new defensible boundary to the Green Belt and wider opportunities where the Green Belt wash is removed from Tidbury Green (see response to Q34 above).

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

We consider that this approach of affordable housing contributions is unconventional and could generate a greater than 50% of housing units being provided for affordable housing, where the mix for private included more 2 and 4 bedroom houses than is required for affordable. We consider that this in-turn could negatively affect the overall site mix, development viability and prohibit development.

We object to this affordable housing approach until further evidence can be provided to justify a habitable room/floor space requirement. We consider that the Council's existing approach on affordable housing is more appropriate.

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

Unless there is compelling evidence to support otherwise, we object to a change in the approach to calculating affordable housing. Most LPAs approach affordable housing on a % of the total housing units and we consider that this approach should remain in place to enable housebuilders to compare like for like opportunities across LPA boundary areas.

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

Please see response to Question 40

Question 42: What other measures would incentivise developers to build more smaller market housing?

Other than applying policies to development sites, the approach that most developers take to housing sites is one of market demand. We consider that where there is a strong demand for smaller market houses then house builders will build them. To rigidly require house builders to build more smaller houses may reduce the ability to meet the market requirements for larger 3 and 4 bed houses. If the supply of these houses is artificially restricted then there is a risk that asking prices would increase which could in turn affect the asking price of smaller properties. Whilst some guidance is expected, a policy influence on the market housing mix is considered unnecessary.

We trust the above representations, those enclosed in the promotion document and landscape and Green Belt submissions made on behalf of Bloor Homes will be properly taken into account. We would welcome the opportunity of having more detailed dialogue with the Council on the strategic housing opportunities that we consider exist in Tidbury Green.

Yours sincerely

A large black rectangular redaction box covering the signature of Michael Davies.

Michael Davies
Planning Director

Appendix A: Bloor Homes- Land at Dickens Heath Road, Tidbury Green

