

Policy and Spatial Planning
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Sent via email to: psp@solihull.gov.uk

Date: 15th March 2019

GLD Ref: GLD16-02

Dear Sirs

Re: Greenlight Developments' Representations to the Draft Local Plan Supplementary Consultation [DLPSC] (January 2019)

These representations by Greenlight Developments to the DLPSC relate to our land interest in Balsall Common; a land interest that forms approximately 3 hectares of the proposed housing allocation, known as, 'Barretts Farm' (Site 1).



Our representations comprise the following:

- This Letter;
- Solihull Draft Local Plan Review of Housing and Older Persons Housing Needs Report (prepared by Lichfields);
- Ecology Report for Greenlight Developments' Site (prepared by Ecology Solutions); and
- Greenlight Developments' Framework Plan.



Greenlight Developments supports, in principle, the 'Barretts Farm' (Site 1) proposed housing allocation. However, as discussed below, and in the accompanying documentation, Greenlight Developments does not support the treatment of its land interest within the 'SMBC Illustrative Emerging Concept Masterplan: Site 1 Barretts Farm' as an "area of significant ecological value". This matter is addressed in detail in the accompanying Ecology Report (prepared by Ecology Solutions).

Greenlight Developments have retained a consistent dialogue with the majority landowner (Colchurch Properties Limited) of the Barretts Farm proposed housing allocation, in terms of working up a Concept Masterplan for the whole site.

The latest Concept Masterplan prepared by The Pegasus Planning Group, which we understand has been shared with Officers of the Council, is referenced as Pegasus Drawing No. BIR.4651_36-01. This latest Concept Masterplan shows the Greenlight Developments' land interest as being developable land with an access point off Meeting House Lane. Greenlight Developments can confirm that it supports this Concept Masterplan (Pegasus Drawing No. BIR.4651_36-01), and it should be this masterplan that the Council's own version is based upon in the Plan (especially given the level of technical work that underpins it).

The Greenlight Developments site could be delivered for a development scheme comprising either circa 60 dwellings, or a care village of circa 150 units (mixture of apartments and beds of C2 accommodation), with its own independent access off Meeting House Lane. The 'SMBC Illustrative Emerging Concept Masterplan: Site 1 Barretts Farm' needs to be amended to reflect this approach to the Greenlight Developments' site.

Paragraph 101 of the DLPSC makes reference to the multiple and complex land assembly issues on the Barretts Farm site, presumably based on varied land ownerships. It also notes that, in terms of masterplanning, this needs to be approached in a comprehensive manner, with clear demonstration that the varied land interests are prepared to work on a collaborative basis.

As already mentioned above, Greenlight Developments is working on a collaborative basis with the majority landowner, Colchurch Properties Limited, on a Concept Masterplan. As such, the matters cited in paragraph 101 of the DLPSC are not considered to be a constraint in terms of development at the Barretts Farm site.

Solihull Draft Local Plan Review of Housing and Older Persons Housing Needs Report (prepared by Lichfields)

This Report (prepared by Lichfields) has considered whether the Council's proposed approach to determining its housing requirement is appropriate; whether the deferral of addressing the wider GBBCHMA unmet housing needs until the Regulation 19 stage is justified; and whether the housing needs of older persons are adequately addressed in the Plan. The key points of this Report are summarised below.

Local Housing Need:

The Council's proposed LHN figure (767 dpa), set out in the DLPSC, is in accordance with the NPPF (2019) and PPG. As stated by the Council, it is considered that there are no exceptional circumstances that would justify a departure from the LHN figure generated by the standard method, and that the Council should, as a minimum, meet their LHN figure. However, the PPG is clear that the standard method does not attempt to predict the impact that future Government policies or changing economic circumstances, and that higher figures may be appropriate on the basis of employment or infrastructure.



The DLP and DLPSC set out the Council's framework for economic growth within the Borough; principally at the UK Central Hub. The NPPF is clear that housing should not be a barrier to economic growth. Currently, the Council has not produced any evidence demonstrating that the LHN figure would provide a sufficient supply of housing in order to accommodate an increase in the workforce. Therefore, there is a cogent need for the Council to demonstrate whether an uplift to the LHN starting point is required to align the envisaged employment growth with housing growth.

The above forms the basis for Greenlight Developments' response to *Question 1* in the DLPSC, which is dealt with in detail on page 4 of the accompanying Lichfields' Report.

Unmet Housing Need:

A significant evidence base has been produced demonstrating the level of unmet needs (c.48,000 dwellings) arising across the GBBCHMA up to 2036. The Council, alongside the other 13 GBBCHMA authorities, have committed to addressing these needs, although no apportionment has been agreed. The changes to LHN figures across the GBBCHMA are not likely to reduce this need, as the application of caps (as per the standard method) does not *'reduce housing need itself'*. Moreover, the BDP evidence base has undergone examination, and produces a higher OAN than the capped LHN figure, and is therefore an appropriate basis for plan-making in Solihull.

The DLP commits to making provision for 2,000 dwellings of the unmet need, however, defers further consideration to the Regulation 19 stage of plan-making. This is not consistent with the NPPF, which states that such strategic matters should be *'dealt with rather than deferred'*. Therefore, there is a need for the Council to consider how they will further address this shortfall through the DLP now. Furthermore, given the strong economic and demographic links between Solihull and Birmingham, to a far greater extent than other neighbouring authorities, there is a need to robustly demonstrate that consideration has been given to making provision for a higher quantum of housing than currently proposed.

Older Persons Housing Need:

The Council's own evidence (the Part 2 SHMA) has concluded that there is a significant need for specialist housing and care home bedspaces in Solihull to 2033, with the current provision within Solihull being well below the national average. However, neither the DLP or DLPSC directly address such needs; rather they appear to defer addressing these needs to either SPDs or site-specific development briefs. The NPPF is clear that the needs of groups with specific housing requirements are addressed and that the size, type and tenure of housing needed for different groups in the community is assessed and reflected in planning policies. Therefore, there is a need to set out how these needs will be addressed within policies in the DLP.

Ecology Report for Greenlight Developments' Site (prepared by Ecology Solutions)

This Ecology Report (prepared by Ecology Solutions) has been prepared in direct response to the manner in which Greenlight Developments' land interest has been treated on the 'SMBC Illustrative Emerging Concept Masterplan: Site 1 Barretts Farm' as an *"area of significant ecological value"*.

Ecology Solutions (Greenlight Developments' ecologists) consider that this 'Illustrative Emerging Concept Masterplan' and the constraints map included within the 'Additional Site Options Ecological Assessment (2016)' and 'Preliminary Ecological Report (2018)', are misguided in relation to Greenlight Developments' site.



The classification of the site as being one where development should be avoided and (instead) ecological enhancements delivered does not fit with the available ecological baseline information when sound ecological judgement is applied.

It is recognised that within the planning system, weight should be afforded to the presence of habitats of ecological value and that impacts on such habitats will be of material consideration when planning applications are being determined. However, the weight afforded to any such impacts must be determined in light of the baseline situation and the ability of any development proposals to mitigate these impacts and deliver appropriate enhancements where appropriate. This is set out within adopted planning policy (including the National Planning Policy Framework) and relevant guidance.

It is clear that the Greenlight Developments' site is not considered to be of high habitat distinctiveness and looking to the description of the grassland habitat included within the 'Additional Site Options Ecological Assessment (2016)', it is clear that this neglected grassland does not comprise a species compliment which would enable a classification as species rich or of existing high ecological value. This evaluation is consistent with Ecology Solutions own findings.

The pond within the Greenlight Developments' site can be considered to be of some ecological value and the same it true of the boundary features, however, these features could be retained and enhanced through the sensitive design of any development proposal.

There is no basis in legislative or planning policy terms to preclude development at the Greenlight Developments' site and available ecological information does not support the preclusion of development. It is accepted that ecological constraints exist at the site, as they do on many sites and indeed, with reference to the documents reviewed as part of this submission, constraints will likely exist for all allocation sites. However, these can be addressed through an appropriately designed scheme at the site, which has regard to any impacts which could arise, following detailed assessment of baseline information.

So long as any scheme being brought forward is sensitive to the need to maintain functional ecological links, deliver enhanced species rich grassland areas, enhanced aquatic habitat and retained / enhanced boundary habitat, all subject to long term management; there is no reason why the site could not support residential / care development, and this is demonstrated by the Greenlight Developments' Framework Plan which formed part of the submission to the DLP (as part of the Vision Document for the site). The recognised value of habitats for certain protected species, means that specific mitigation would be required but it is considered that this could easily be delivered in tandem within a sensitively designed development scheme (as per the Framework Plan).

The above forms the basis for Greenlight Developments' response to *Question 4* in the DLPSC, with the treatment of Greenlight Developments' land interest as an "*area of significant ecological value*" being comprehensively dealt with in the accompanying Ecology Solutions Report.

Furthermore, the Illustrative Emerging Concept Masterplan for the Barretts Farm site needs to recognise Greenlight Developments' access onto Meeting House Lane (in the same way it recognises a similar type of access further east along Meeting House Lane – annotated with a red arrow).



Summary

Greenlight Developments requests an immediate meeting with Officers of the Council to discuss the 'Illustrative Emerging Concept Masterplan for the Barretts Farm site', reclassifying Greenlight Developments' site for development and including the development's access off Meeting House Lane (as shown on the Framework Plan). We will be in touch shortly with Officers to arrange such a meeting.

Yours sincerely



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Director**

Encs.