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15th March 2019

29099/A3/DGW/AB/sw

Dear Gary,

**SOLIHULL LOCAL PLAN REVIEW: DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION
LAND AT WYCHWOOD ROUNDABOUT**

Introduction

We write on behalf of our Client, Albanwise Limited, in response to the Solihull Local Plan Review: Draft Local Plan Supplementary Consultation. We respond in respect of their land interest known as 'Land at Wychwood Roundabout' ('the Site'); and support its inclusion within the Draft Local Plan Review, as a suitable and sustainable location for residential development.

Albanwise Limited are the freehold owners of the Site - a Site Location Plan is enclosed at **Appendix 1** of this letter.

Site, Surrounding and Context

The Site is a linear-shaped parcel of vacant land running in a roughly southerly direction between the roundabout at the junction of A4141 (Warwick Road)/Wychwood Avenue/Langfield Road in Knowle, Solihull. The Site is surrounded by residential dwellings, which adjoin its southern, eastern and western boundaries. These dwellings front onto Longdon Road, Newton Road, Copt Heath Drive, Holbeche Road and Abbots Close. The northern boundary of the Site abuts the A4141 Roundabout.

The Site measures approximately 1.98 hectares (4.9 acres) and is identified in the Solihull Strategic Housing and Employment Land Availability Assessment (2016) as 'Land at Wychwood Roundabout' (SHLAA Site Reference: 125).



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Knowle Church of England Primary School is located 0.4 miles east of the Site, Bentley Heath Church of England Primary School is 0.6 miles south-west of the Site, St George and St Theresa Catholic Primary School and Dorridge Primary School lie 0.8 miles away. There are several businesses in close proximity to the Site. Two Business Parks, namely: Blythe Valley Business Park and Monkspath Business Park lie within 2.4 miles of the Site.

There are several existing areas of play and public open spaces located throughout the Knowle-Dorridge-Bentley Heath-Hockley Heath conurbation, the closest being Knowle Park which is just 0.1 miles south of the Site. Knowle Village Cricket Club and Knowle Football Club are 0.4 miles away.

In terms of transport connections, the Site Roundabout is located immediately south of the A4141 (Warwick Road), which provides direct access northwards to the M42 Motorway and southwards to Chadwick End, Birmingham Road and Warwick. The Site benefits from good bus connections with existing bus stops around 70m away on the A4141 (Warwick Road). These bus stops provide frequent services to Solihull town, Solihull Railway Station, Dorridge, Coventry, Balsall Common and Hockley Heath.

The Site is approximately 1.3 miles away from Widney Manor Railway Station, 1.4 miles away from Dorridge Railway Station and 2.4 miles away from Solihull Railway Station. All three Stations offer frequent daily services to Birmingham, Stratford-upon-Avon, Worcester, Stourbridge, Leamington, Kidderminster and London.

There are no statutory landscape or ecological designations at the Site, including; Area of Outstanding Natural Beauty, Green Belt, Site of Special Scientific Interest, Ramsar Sites, Special Areas of Conservation, Special Protection Area or Ramsar Site.

Purnell's Brook forms the eastern boundary of the Site, however, based on the GOV.UK website, the Site falls entirely within Flood Zone 1, which is the lowest risk of flooding (land having a less than 1 in 1,000 annual probability of river or sea flooding). The GOV.UK website also indicates that the Site does not fall within an area susceptible of surface water flooding and is identified as an area of 'very low risk' from surface water, meaning it has a chance of flooding of less than 0.1%.

Furthermore, Historic England's online register confirms that there are no listed buildings located within, or immediately adjacent the Site. The Site is also located outside of a Conservation Area. The closest heritage assets are Grade II Listed 'Artillery Cottage' and '1587, Warwick Road', approximately 0.2 miles east, on the A414 (Warwick Road). However, these heritage assets are extensively shielded from the Site by existing urban form.

The Site is available for development, deliverable, sustainable and well located in the context of Knowle. The Site is within close walking distance to a range of amenities, services, facilities and transport links. Albanwise Limited propose to deliver a masterplanned scheme which integrates well into the existing character of the area.

We consider there is potential to develop the Site for housing in order to contribute in the early phase/s of the Local Plan period. Our Client's land interest is contained wholly within the settlement of Knowle and the delivery of residential development would provide a logical infill to the existing urban area.

Planning History

In April 2013 an application was submitted by 'The Knowle Society' to Solihull Metropolitan Borough Council (SMBC) to register the Site as a Town Green pursuant to the provisions of section 15(2) of the Commons Act 2006 (Ref. 213123). However, following a three-day public inquiry on 1st, 2nd and 19th February 2016, the Inspector concluded that the applicant had failed to satisfy all the elements necessary to justify the registration of the Site as a Town Green.

As such, the Inspector's recommendation to SMBC was that the application to register the Site should be rejected. SMBC accepted the Inspector's recommendation and refused the application at their Planning Committee meeting on 5th October 2016.

It is noted that the Site has not been subject to any planning application for residential development.

Consultation Response

We kindly ask you to read this letter and consider the allocation of the Site for future residential development, as part of the ongoing preparation of the Solihull Local Plan Review.

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

The revised end date of the Plan period (2035) is broadly welcomed, which, according to the Local Development Scheme (2018), will be adopted in Spring/Summer 2020. If the Local Plan Review is adopted in 2020, then it is recognised that this will meet the minimum 15-year plan period requirement that is set out in Paragraph 22 of the National Planning Policy Framework (NPPF) (February 2019).

However, it is considered that SMBC should amend the Local Plan end date to 2036, for two main reasons, namely:

1. The GL Hearn published Greater Birmingham HMA Strategic Growth Study (February 2018), which is a strategic growth study into the Greater Birmingham and Black Country Housing Market Area, covers the plan period to 2036. In fact, Paragraph 28 of Solihull's main consultation document recognises that **"to help inform the Duty-to-Cooperate discussions the 14 HMA authorities commissioned a study (the Strategic Growth Study undertaken by GL Hearn). One of the aims of the study was to look at options that may be required beyond 2031 (recognising that 2036 provides a useful date to assess need to and what supply is currently identified to that date), and some of the options would take a significant time to come forward thus contributing to supply beyond 2036."** (our emphasis)
2. SMBC should extend the Plan period to ensure that upon adoption, the strategic policies within the Solihull Local Plan Review look ahead over a minimum 15-year period from adoption. In the event that there is a delay in the Local Plan's preparation, there would be sufficient flexibility if the Plan period was extended to 2036. These policies should anticipate and respond to long-term requirements and opportunities affecting Solihull Borough. If the Local Plan Review is adopted post 2020, then SMBC will not accord with Paragraph 22 of the NPPF.

Paragraphs 41-53 of the main consultation document addresses the Council's approach to establishing the local housing need figure for Solihull Borough. This section then asks the reader Question 1, as

above, before proceeding to address both the Housing Market Area and the Land Supply for the Borough.

In responding to Question 1, it is noted that paragraphs 60-61 the NPPF state:

“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 reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)” (our emphasis)

It is clear from the above that the starting point for establishing the local housing need figure must be the Standard Method. According to the Planning Practice Guidance (PPG) on 'Housing and economic needs assessment' (HENA) published on 20th February 2019, the calculated level of housing need for Solihull Borough is 777 dwellings per annum.

However, the NPPF makes clear that in addition to an authority's local housing need, any unmet needs which arise within the wider housing market area should be taken into account in establishing the total amount of housing.

With this in mind, it is noted that the Birmingham Development Plan (adopted 2017) confirms there to be a shortfall of 37,900 dwellings up to 2031 that cannot be accommodated within Birmingham's administrative boundary. SMBC, as one of 14 local authorities which comprises the Greater Birmingham HMA, will need to have regard to the unmet needs within this housing market area. It has also become clear through the early stages of the review of the Black Country Core Strategy that an additional shortfall of around 22,000 dwellings has been identified.

We therefore urge SMBC to ensure the Local Plan Review suitably considers unmet housing needs within the HMA up to 2036.

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

Paragraph 16 of the NPPF advocates that Plans should be prepared with the objective of contributing to the achievement of sustainable development. In doing so, the Council must allocate land for future development at the most appropriate areas for growth. Furthermore, as set out in Paragraph 7 of the NPPF, the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, namely:

- Economic Objective;
- Social Objective; and

- Environmental Objective.

Considering the above, it is recommended that the Council take a positive approach when considering development proposals that accord with the presumption in favour of sustainable development, as seen at Paragraph 11 of the NPPF, and proactively work with applicants to find solutions so that proposals can be approved wherever possible.

As such, we are supportive of the first step in Solihull's Site Selection Methodology. In particular, we are in favour of the sequential approach that directs growth to particular locations across the Borough, as first detailed in background 'Topic Paper 4 - Reviewing the Options for Growth and Site Selection process'.

The Site Selection Methodology, was refined in the current Draft Local Plan consultation and provides 10 Categories within a Site Hierarchy. We agree with the Council and consider that sites which fall within Priorities 1 to 4 of the Site Hierarchy Criteria, should be considered most suitable for inclusion in the Plan.

In particular, it is considered that greenfield land that is in an urban area or settlement, which is priority 2 in the Site Hierarchy Criteria, should be considered sustainable. Land which is non-Green Belt, non-previously developed land, not in beneficial use (or where the impact on the beneficial use can be mitigated) (i.e. greenfield site in urban area/settlement), is fully supported.

Indeed, the Site is located wholly within the settlement boundary of Knowle and consists of an area of privately-owned greenfield land that is outside of the Green Belt. The Site therefore fully accords with priority 2 of the Site Selection methodology. Inclusion of the Site at Paragraph 438 of the main consultation document is therefore fully supported and is considered a suitable and sustainable location to deliver a minimum of 20 dwellings.

However, to ensure that the Local Plan Review is effective, we would recommend that the Site forms part of a specific site allocations policy – confirming that the Site can deliver a minimum of 20 dwellings. As currently drafted, it is unclear that the sites included at Paragraph 438 form part of the Council's proposed housing supply. Alongside this policy, it would be considered prudent to include the Site as a residential allocation within the Local Plan Review's supporting Proposals Map.

Summary

SMBC's adopted Local Plan covers the period 2011 to 2028 and sets a housing land provision target to deliver 11,000 net additional dwellings. However, a 2014 High Court Judgement ordered that parts of the Local Plan, which relate to the provision of land for housing, was remitted to the Council. As such, sections of the Local Plan relating to the provision of housing are treated as not being adopted.

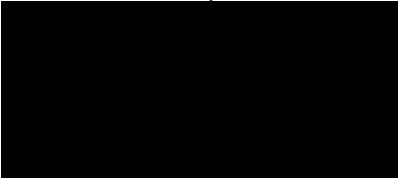
As such, we welcome the Solihull Local Plan Review, which is intended to take into account circumstances affecting the area and any relevant changes in national policy. Once adopted, the new Local Plan will replace the current Local Plan. As part of this process, we encourage SMBC to not only meet their own housing need in full but also to appropriately contribute to supporting unmet need across the Greater Birmingham HMA.

With this in mind, inclusion of the Site as a suitable and sustainable location to deliver a minimum of 20 dwellings is fully supported. The Site is available for development, deliverable, sustainable and well located in the context of Knowle with a range of amenities, services, facilities and transport links within walking distance.

We consider there is potential to develop the Site for housing in order to contribute in the early stages of the Local Plan period. Our Client's land interest is contained wholly within the settlement of Knowle and the delivery of residential development would provide a logical infill to the existing urban area. We would be grateful if you acknowledge receipt of our submission to Solihull Local Plan Review: Draft Local Plan Supplementary consultation and welcome the opportunity to discuss these matters further with the Policy and Delivery team.

We trust this submission is clear and helpful, but should there be any queries in relation to the above, or consider a meeting would be helpful, please do not hesitate to contact Alastair Bird or myself.

Yours faithfully



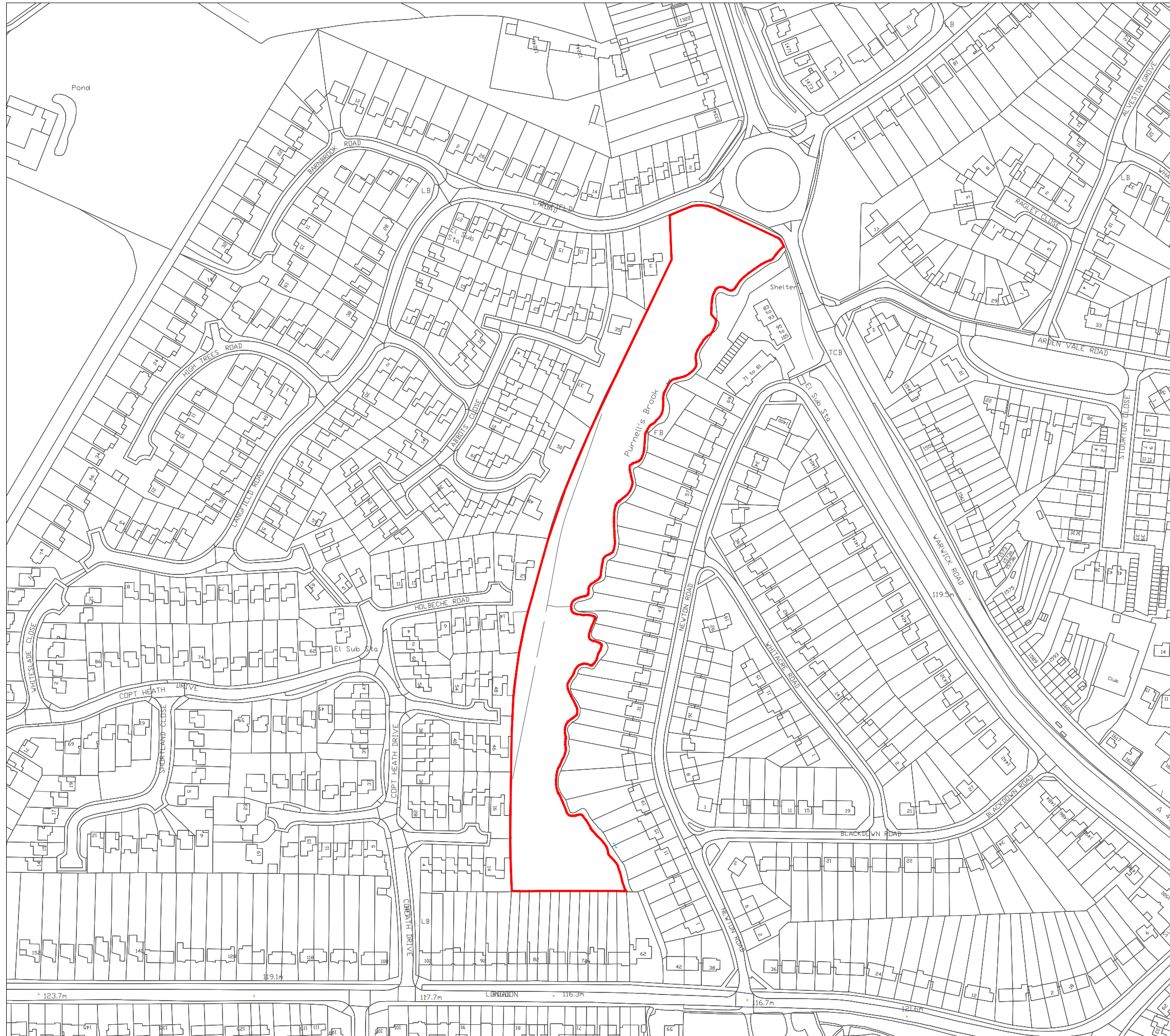
Daniel G Wilson

Senior Planner

Enc.

CC: Roland Bohn - Albanwise Limited

APPENDIX 1



The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

Legend

— Site Boundary (1.98Ha)

Project
Land at Knowle



Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
22.05.18	1:2,500@A3	M.S.	A.B.

Project No	Drawing No	Revision
22550	BM-M-01	-



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