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Dear Mr Palmer,

**Solihull Local Plan Review
Draft Local Plan Supplementary Consultation: Representations on behalf of Heyford
Developments**

We are instructed by Heyford Developments (**‘the representor’**) to submit representations to the Draft Local Plan Supplementary Consultation and welcome the opportunity to provide our comments at this stage. The representor is promoting land to the west of Diddington Lane, Hampton-in-Arden for release from the Green Belt and its allocation for residential development (see attached site location plan).

We note that this is a non-statutory consultation as part of the Plan making process and that the Council are seeking views primarily on the updated housing need along with the range of sites that the Council has identified in order to meet these requirements. What is more telling is that the Council are not seeking views on the proportion of the unmet housing need arising in Birmingham City and how much of this the Council is willing or able to accommodate. An arbitrary figure of 2,000 dwellings has, therefore, been identified and carried forward from the previous consultation, although this is yet to be agreed with the remaining Housing Market Area (HMA) authorities and could be subject to change. To date, there has been very little progress on agreeing what the requisite splits should be between all the constituent HMA authorities and therefore, very little weight should be attached to the Council’s proposal to accommodate 2,000 dwellings of Birmingham’s unmet need.

Notwithstanding the Council’s approach to this matter, any change to the number of dwellings that they may ultimately agree to accommodate has the potential to fundamentally change the range and number of sites that will be required to meet the Council’s needs in full as well as an agreed proportion of Birmingham’s unmet needs. In light of this, the representor is of the view that there is a very real prospect that additional sites and land will be required and that, as a result, the Council should be seeking views as part of this consultation as to the potential of those sites that they have currently discounted and how these could contribute to meeting an increased demand for land. Clearly, if further sites are required, this raises questions over

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increased demand for land. Clearly, if further sites are required, this raises questions over whether the Council's spatial strategy is sound and will be able to accommodate the increased level of development across the District.

The land at Diddington Lane, Hampton-in-Arden is one such site that has currently been discounted as being suitable for allocation. However, it is our contention that, should there be a need to identify additional sites, then Hampton-in-Arden, which is one of the more sustainable locations in the District to accommodate new development, should be considered and the representor's site should be removed from the Green Belt and allocated for development.

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 agree with the Council's approach to calculating the local housing need figure and consider that the use of the standard method is correct and accords with current policy and guidance. Furthermore, we also welcome the fact that the Council have also calculated the housing need figure for the District using both 2016-based and 2014-based household projections.

At the time of writing, the Government have yet to publish the outcome of the findings on the "Technical Consultation on Updates to the National Planning Policy and Guidance" which concluded in December 2018. It is anticipated that the Government will revert back to using the 2014-based household projections (as opposed to the 2016-based projections) for the purposes of calculating local housing need using the standard method. As such, we welcome the approach taken by the Council in setting out what the need figure would be based on both projections, noting that the 2014-based figure generates a higher annual dwelling requirement which is clearly supported.

The local housing need figure using the 2014-based projections identifies a requirement of 767 dpa (when the affordable ratio is applied), which compares to only 689 dpa when the need was established through the Strategic Housing Market Assessment (SHMA). In light of the fact that the standard method figure generates a higher annual requirement than that identified through the SHMA leads us to conclude that there are no exceptional circumstances to look to use an alternative approach. The Council should, therefore, use the standard method as the starting point for calculating local housing need.

As set out above, the issue of how much of Birmingham's unmet needs are to be accommodated by the Council is yet to be resolved. However, this should not impact on the use of the standard method to calculate Solihull local housing need requirement and it should be made clear, that any additional housing to meet Birmingham's needs will be provided over and above that amount identified for Solihull by use of the standard method.

16. Do you agree with the infrastructure requirements identified for Hampton in Arden, if not why not; or do you believe there are any other matters that should be included?

The Plan does not specifically identify any infrastructure that is required in Hampton-in-Arden in order to support new development. The only reference to infrastructure is in paragraph 169, where it states that new development should not overwhelm existing infrastructure such as the school. However, we do not agree that the existing capacity of infrastructure, such as local schools, should limit the ability of the settlement to accommodate further development. New development should be brought forward in accordance with the provision of new infrastructure to accommodate the proposed development, which can in part be funded by the development.

Lack of capacity in infrastructure should not be used to frustrate the delivery of new development, particularly where new development can help to contribute to the supply and availability of infrastructure in a locality.

17. Do you believe that Site 6 Meriden Road should be included as allocated site, if not why not? Do you have any comments on the draft concept masterplan for the site?

No, we do not agree that the site should be included as an allocated site. We understand the site is still currently in use and occupied and therefore, there is no guarantee that it will become available any time soon. Furthermore, the adjacent site (Site 24) was allocated in the 2013 Local Plan and is yet to come forward for development, more than 5 years since the date of adoption. The reason given in the masterplanning document is that this is due to the continued operation of Arden Wood Shavings on the current draft allocated site. It would appear that delivery of the site and the previously allocated site is entirely dependent on the relocation of the Arden Wood Shavings, which is totally outside of the Council's ability to control.

In contrast, the land at Diddington Lane does not have the same constraints with the land able to be made available at short notice. Furthermore, it is being actively promoted by a promoter, who is looking to bring the site forward for development and who has a strong track record of delivering similar sites both in the Borough and wider West Midlands area.

Notwithstanding the above, we also consider the land at Diddington Lane is better located within the settlement than the current draft allocations, with it being closer to the train station as well as the existing shops, services and primary school.

In terms of the masterplan for the draft allocation, we consider that the site has a very poor relationship to Meriden Road, with it being imperceptible as you approach the village from the south east. A stronger frontage at an important gateway to the village would be beneficial.

The relationship of the existing property fronting Meriden Road and the proposal to wrap new development around it and between the north west tip of the site will result in a cramped setting for any new dwellings proposed on this part of the site.

The road hierarchy is confused. The site would lend itself to a strong central estate road, with minor roads running off it, leading to private drives to serve smaller groups of dwellings. We are not convinced that a development of up to 200 dwellings would require a loop. Furthermore, single sided development along the site's eastern boundary would not be economical and would be resisted by a housebuilder.

The area of POS would likely serve a better purpose if it was divided into two or three smaller areas and distributed more evenly through the development.

The landscaping appears to be located around the periphery in order to screen views into the site from outside. We are not convinced that this represents the best approach and instead this should be looked at in terms of where views are available or where the topography requires additional landscaping. Screen planting just to hide a development is not in our view an acceptable design response.

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

We consider that the land at Diddington Lane, Hampton-in-Arden, which was assessed as a red omitted site, should be included in the Plan. Our reasoning for this stems from the fact that the site is located within one of the main settlements in the District and is, therefore, capable of accommodating new residential development. The fact that the Council have already identified an allocation in the adopted Local Plan and a draft allocation in the Local Plan Review confirms the suitability of the settlement to accommodate new growth. Whilst additional development is considered acceptable in Hampton-in-Arden, we have set out above why we consider the land off Meriden Road has deliverability concerns as the land is currently occupied and its redevelopment is subject to the current occupier relocating. We are not aware of what their intentions are and when they may be relocated. Until such time as they do relocate, Hampton-in-Arden will be starved of any meaningful new development.

By contrast, the representor's land is not encumbered by a sitting tenant and the landowner is a willing party, who wishes to see the site redeveloped. The site is therefore available and provides certainty that it could come forward for development sooner and contribute to the supply of housing in the early part of the Plan Period. Furthermore, we are not aware of any legal or third party issues that would prevent the delivery of the site.

Initial masterplanning work undertaken on behalf of the promoter/landowner indicated that the site had a total capacity of between 600 – 800 dwellings. In light of the ongoing discussions about the amount of Birmingham's unmet need the Council will agree to accommodate, the exact extent of the land that may be required for housing in the emerging Plan is not yet established. The land at Diddington Lane, therefore, has the ability to meet a wide variety of needs once it has been established how much additional housing the Council are going to agree to accommodate. Furthermore, having regard to the size of the existing settlement, development could be phased so that any needs are met in the current Plan Period but that additional land could be made available to meet needs arising in the next Plan Period.

The representor's site is of a sufficient size to meet a wide variety of needs, including both the delivery of market and affordable housing, and it can accommodate new areas of public open space, which would help increase access to areas that were previously inaccessible due to them being in private ownership. In addition, the site benefits from it being very well located to the village centre and the shops and facilities that are located here including the primary school, GP surgery and local shop and public house. Furthermore, Hampton-in-Arden train station is located less than 300 metres from the site, which provides services to Birmingham Airport, central Birmingham and Coventry, and beyond to the wider West Midlands region.

New pedestrian and cycle linkages will be created to help link the development to the centre of the village and increase permeability through the site.

The proposed HS2 railway line is proposed to pass to the east of the site, clipping the site in its north east corner. The railway line will in due course create a very strong defensible boundary within which to contain the eastward expansion of the settlement further.

The land at Diddington Lane is being actively promoted by a promoter who has instructed a number of baseline surveys to be undertaken in order to understand any constraints and opportunities to guide future development. There is a commitment on the part of the promoter to bring the site forward for development and they are willing to work with the Council to do so. To assist the Council's ongoing consideration of potential alternative sites, the promoter is currently

preparing a Vision Document along with an associated concept masterplan to help demonstrate that the site is deliverable and to provide greater certainty to the quantum of development that the site could deliver and when.

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

No. In requiring 40% of the total development area to be provided as affordable housing, this could be achieved by building fewer larger units, thereby totally negating the objective the Council were looking to achieve. Similarly, the build cost associated with building fewer larger units would be less than requiring more smaller units to be built. The requirement would not incentivise developers to build more smaller market housing.

The suggested approach would also pose a number of issues for the Council in how it was able to dictate what affordable housing was provided in terms of unit size. If the requirement was only to provide 40% of the total, the Council would not be able to stipulate what sized units came forward and as stated above, the risk is that fewer larger units come forward. Whilst the total area of affordable housing would increase, the total number of units provided would decrease thereby undermining the Council's objectives of providing affordable housing. The Council would be left in a considerable state of uncertainty as to how to plan to meet specific needs arising or those known needs on the housing lists.

As a practical point, planning a site and then ensuring that this married up with the Section 106 Agreement could become very difficult. Any change in the layout may result in the proposed development not matching the Legal Agreement. Similarly, any changes in the overall housing mix in terms of additional floorspace would result in the whole affordable housing scheme having to be changed to reflect these changes. The result would be significant additional work in trying to get the scheme planned out and designed up which would result in slower delivery of both market and affordable housing.

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?

In light of our comments to Question 40, our preference would be to remain basing the affordable housing contribution on 40% of the total units.

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

See answer to Question 41.

43. What other measures would incentivise developers to build more smaller market housing?

Whilst not necessarily an incentive, in order to secure more smaller market housing this needs to be linked to evidence that this is what is needed, either by way of an up to date SHMA or similar needs assessment. If the evidence doesn't exist that smaller market housing is required, where is the justification that it should be provided.

If smaller market housing is required, why not incentivise its provision by requiring less developer contributions elsewhere within the development for example.

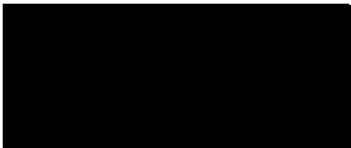
44. Are there any other comments you wish to make on the Draft Local Plan Supplementary Consultation?

Notwithstanding that the Council are proposing to release land from the Green Belt to meet the housing needs in the emerging Plan Period, the issue of releasing land from the Green Belt and safeguarding this for future development has not been addressed. If Green Belt land is needed this time around, in all likelihood, further Green Belt land is going to be needed again when the Council comes to review the Local Plan. In order to avoid having to undertake a further Green Belt Review next time round, removing land from the Green Belt as part of this Plan and safeguarding it for development beyond the Plan Period would be an entirely sensible approach and wholly in accordance with the policies of the Framework (paragraph 139).

We trust you take our comments into account and look forward to being notified of the next stage of consultation planned for the summer.

In the interim, if there is anything above you require further explanation of or if you have any questions please do not hesitate to contact me.

Yours sincerely



JOHN PEARCE
Senior Planner



cc J Tomlinson – Heyford Developments