Reviewing the Plan for Solihull's Future: Solihull Local Plan Review – Draft Local Plan Supplementary Consultation (January 2019)

Representations on behalf of IM Land in respect of Land at Earlswood Station

March 2019



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March 2019

1. Introduction

- 1.1 We write on behalf of our client, IM Land (hereafter referred to as 'IM'), who are working with the landowners in response to the Solihull Local Plan Review (SLPR) Draft Local Plan Supplementary Consultation (DLPSC), which was published for consultation in January 2019.
- 1.2 IM Land is actively promoting land around Earlswood Station (site reference 141) known as 'Rumbush Village'. IM Land, the strategic land division of IM, and IM Properties are actively promoting several sites and assets within the Borough; separate representations have been submitted in relation to IM Land's other interests and IM Properties interests.
- 1.3 Land around Earlswood Station has the potential to assist the Council in delivering its vision for the Borough through new residential-led development and the opportunity for a new Primary School; making a significant contribution towards meeting the development needs of Solihull over the plan period and beyond.
- 1.4 The site that forms the subject of these representations is in a single land ownership and is therefore deliverable within the Plan period. It is in a highly sustainable location, immediately adjacent to Earlswood train station. It is relevant to note that the site forms part of a wider development opportunity, comprising land located within Stratford District Council's boundary. Whilst IM Land would welcome the opportunity to discuss this cross working further with officers at both SMBC and SoADC, for the purpose of these representations, the focus in the first instance is on the potential of land within Solihull Metropolitan Borough Council's (SMBC) boundary.

Approach to Consultation

- 1.5 IM notes that the purpose of this consultation is to invite comments specifically in relation the following matters:
 - Local Housing Needs and the use of the Standard Methodology;
 - Assessment of additional sites and the selection methodology for preferred sites;
 - Concept masterplans for the principal allocations;
 - A different approach to calculation of affordable housing provision; and
 - The role of main settlements and infrastructure requirements for each.
- 1.6 The consultation document confirms that at this stage the Council is not seeking to revise the overall spatial strategy set in the Draft Local Plan (DLP), revise the contribution the Council is making towards the Greater Birmingham Housing Market Area (HMA) shortfall, or to revisit the non-housing related parts of the DLP.

1.7 Whilst IM welcomes the opportunity to comment on the progress of the DLP, it is their firm view that separating out these various elements of the plan is a flawed approach. The future development needs of the Borough, in terms of both housing and employment, are fundamentally linked, as are the needs and growth ambitions of the wider area. As such, these matters cannot be considered in isolation and this would bring into question the 'soundness' of any future plan which has been prepared in a piecemeal manner.

The Site and its Surroundings

- 1.8 IM submitted representations to the Draft Local Plan Review Consultation (DLPRC) which was published for consultation in November 2016. The previous representations are enclosed at **APPENDIX 1**.
- 1.9 The representations submitted to the DLPRC focussed on the wider site controlled by IM Land – approximately 90 to 95 hectares of land around Earlswood Station. The Vision Document submitted in support of these representations demonstrates how the 23.05 hectares of land within SMBC's boundary could be brought forward. The wider site is a cross boundary site and falls within the administrative boundaries of both SMBC and Stratford on Avon District Council (SoADC). It is considered that the wider site could deliver up to 1,750 new dwellings, community facilities including a village hall and shop, a primary school, and extension to the existing car park at Earlswood Station, play areas and green spaces.
- 1.10 SoADC signed a Memorandum of Understanding (MoU) to accommodate 3,300 dwellings to help Birmingham address its shortfall. It is considered that the site which forms the subject of these representations, and the wider site, provides the opportunity for SMBC to work together with SoADC to help meet Birmingham's housing shortfall in a sustainable location.
- 1.11 A Vision Document (APPENDIX 2) has been prepared for the area to the east of the railway, which is predominately within SMBC, demonstrating how the site 'Rumbush Village' could deliver a sustainable new village that could result in the following benefits:
 - **Homes:** Up to 500 new homes of diverse tenure, size and type, creating a truly mixed community.
 - **Landscape:** a central component of the development, providing over 11 hectares of open space.
 - **Supporting uses:** Opportunity for mixed-use functions to support the existing and future local community, including potentially a primary school.
 - **Sustainable Transport:** The site is adjacent to an underutilised railway station, just 25 minutes from both Birmingham and Stratford upon Avon.
- 1.12 Rumbush Village is currently located within the Green Belt, however subject to the site being removed from the Green Belt it is considered that the wider site could deliver up to 500 new dwellings in a sustainable location which is well served by public transport.

1.13 The remainder of these representations focus on the area of land identified as Rumbush Village in the accompanying Vision Document.

2. Responses to Questions

2.1 We respond to the relevant questions in respect of the land around Earlswood Station, Solihull, below.

Chapter 3 'Housing Requirement & Current Land Supply'

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?

- 2.2 It is noted that since the Draft Local Plan Supplementary Consultation was issued, an updated NPPF has been published. SMBC should be satisfied that, following the updated NPPF in February 2019, there have been no further changes to their annual requirement for housing. The DLP Supplementary Consultation (DLPSC) has not: revised the contribution SMBC is making towards the HMA shortfall; amended the overall spatial strategy set out in the DLP; or revisited the non-housing related parts of the DLP. Therefore, SMBC continue to only commit to accommodating 2,000 dwellings from the wider HMA shortfall, equating to an additional 118 dwellings per year and increasing the total annual requirement to 885 dwellings per year.
- 2.3 IM agrees that the use of the standard methodology represents a good 'starting point' in determining the local housing need. In the first instance it is important to highlight that the standard method for assessing housing needs provides a minimum starting point (PPG reference ID: 2a-010-20190220).
- 2.4 However, it is clear that several of the circumstances identified within the PPG as being appropriate circumstances within which to plan for a higher number of homes than the standard method indicates are quite clearly applicable to Solihull. The two factors that are of particular relevance are (a) in relation to the potential for 'supergrowth' associated with High Speed 2 (HS2), the planned investment in strategic infrastructure improvements at UK Central and elsewhere in the Borough to facilitate growth, and (b) the explicit acceptance that Solihull should accommodate some of the unmet need from the Birmingham HMA.
- 2.5 Whilst IM acknowledge the Council's intent to further consider the unmet needs of the wider HMA in the Submission version of the SLPR, it is important that the Council seriously consider whether the growth associated with the new HS2 interchange, and the wider plans for major economic development and associated residential development at UK Central needs to be further analysed and better understood before the Local Housing Need figure is fixed based on the standard methodology.
- 2.6 Economic growth associated with HS2 has been considered by the Greater Birmingham and Solihull LEP in their Midlands HS2 Growth Strategy (July 2015). This document makes clear that there is a significant potential to deliver growth on a nationally significant scale over and above the construction of HS2. The report concludes that the arrival of the two HS2 stations into the region "will drive new areas for regeneration, housing and business growth across the Midlands". This so termed 'supergrowth' has the potential to drive a significant demand for additional housing within the Borough.

- 2.7 Previous representations submitted by Turley on behalf of IM Land (**APPENDIX 1**), raised concerns that the Housing Need identified in the DLP did not make adequate provisions for 'supergrowth', and indeed did not reflect the Council's own ambitions (as set out within the plan) for economic growth within the Borough. These concerns still stand, and without understanding at this stage whether the Council's position on employment and the potential for 'supergrowth' has changed, it is difficult to confirm whether 'exceptional circumstances' may exist to justify the use of an alternative approach to the determination of local housing need.
- 2.8 The previous representations submitted by Turley on behalf of IM Land have also identified that the provision of only 2,000 additional homes to address the wider housing shortfall across the HMA is not sufficient. This provision represents just 6% of the overall shortfall that must be accommodated. Given Solihull's relationship with Birmingham in particular, it is important that further evidence is provided to demonstrate how this figure has been identified, and to confirm that it is the correct level of provision.
- 2.9 In summary, it is considered essential that as part of progressing the Local Plan to the next stage of drafting (due for publication in Summer 2019):
 - SMBC reach a more firm position in respect of the level of HMA shortfall that will be accommodated in the Borough; and
 - SMBC give greater consideration to the economic development that will take place within the Borough during the Plan period.

Chapter 4 'Site Selection Process'

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

- 2.10 The Site Selection process was carried out in two stages, the first of which determined where in the site hierarchy each site fell within.
- 2.11 It is considered that the 'Step 1 Hierarchy Criteria' does not fully align with the recommendations within the NPPF. SMBC have acknowledged the need to release Green Belt land for development and have given first consideration to land which has been previously developed (PDL). However, the NPPF at paragraph 138 states that:

"Where it has been concluded that it is necessary to release Green Belt land for development, **plans should give <u>first consideration</u> to land which has been previously-developed and/or is well-served by public transport."** (Emphasis added)

2.12 SMBC have not referenced land which is well served by public transport within the Site Hierarchy Criteria, Footnote 35 of the DLPSC provides a definition of an 'accessible Green Belt location' stating that:

"An accessible location is located either (a) on the edge of an urban area, (b) on the edge of a settlement that has a wide range of services including a primary school and range of retail facilities. In this context a broad approach to accessibility is used based

on a sites location in/edge of urban area or settlement. A finer grain of accessibility is used at step 2."

- 2.13 SMBC have also given consideration to a site's performance against the five purposes of including land within the Green Belt ahead of land which is well served by public transport this is not the approach recommended by the NPPF. Consideration as to the impact on the Green Belt should take place at Step 2.
- 2.14 Step 1 in the site selection process has failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF. It is considered that, if the 'Step 1 Site Hierarchy Criteria' had been approached correctly, land around Earlswood Station would have progressed to be considered at Step 2, rather than being immediately discarded. The site is located on the main railway line between Birmingham and Stratford-upon-Avon, and is therefore in a highly sustainable location, in line with the NPPF 'test'.
- 2.15 Step 2 in the site selection process assesses sites considered to be a potential allocation (yellow) or an unlikely allocation (blue) against a set of refinement criteria, to confirm whether these sites should be green, amber or red. Sites considered green or red at step 1 do not require further assessment.
- 2.16 The refinement criteria for step 2, at page 19 of the DLPSC, do not include sites that are well served by public transport within the 'factors in favour'. Therefore, Step 2 in the site selection process has failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF.
- 2.17 The methodology for the site selection process should be amended to align with the recommendations within the NPPF. The current approach immediately discards any potential sites, such as Earlswood, that provide the opportunity to deliver new homes in a sustainable location.
- 2.18 It is considered that land around Earlswood Station should pass through the Step 1 as a Green Site which would then fall to be considered at Step 2. Table 2.1, below, provides an assessment of land around Earlswood Station against the Refinement Criteria. This assessment provides evidence that the site should be considered for allocation through the Local Plan Review.

Factors in Favour	Assessment of land at Earlswood Station
In accordance with Spatial Strategy	SMBC have identified that exceptional circumstances exist to release land from to Green Belt to deliver their housing need. The site presents an opportunity to provide homes in a sustainable location which is well served by public transport.
Any hard constraints only affect a small proportion of the site and/or can be	The main hard constraint to the site is the railway line – this, however, provides an opportunity due to the site's proximity to Earlswood station. The railway line does

Table 2.1: Assessment of land at Earlswood Station against Refinement Criteria

mitigated.	not impact upon the availability, achievability or
	deliverability of the site.
Site would not breach a strong defensible boundary to the Green Belt	The site provides the opportunity to create a new village in a sustainable location – therefore preventing the sprawl of existing settlements. The Green Belt boundary (as amended) could be suitably addressed.
Any identified wider planning gain over and	As set out in the Vision Document, the site provides the following planning gains:
above what would normally be expected.	 Opportunity to create a high quality, desirable place to live that provides for local and strategic housing needs and will appeal to people of all ages and backgrounds.
	 Potential to maximise the opportunity presented by the underutilised railway station at Earlswood, promoting sustainable movement.
	 Potential to maximise the opportunity presented by the existing wider landscape environment including assets such as Clowes Wood and Earlswood Lakes.
	• Landscape and ecological resources such as trees and hedgerows within the site form a characterful feature of the land that can be preserved wherever possible.
	• Significant opportunity to identify points of access into the development and opportunities for through movement within the site to promote movement on foot and by bicycle, particularly into Earlswood station.
	 Opportunity to enhance existing public rights of way through the site, allowing the potential to connect to surrounding assets.
	 Three pedestrian crossing points over the railway line are located in relatively close proximity, allowing ease of access on foot into the wider environment.
Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.	Technical evidence prepared by Barton Willmore demonstrates that the site provides the opportunity to create a strong defensible boundary.
If finer grain accessibility analysis shows the site (or part to be included) is	The site is able to deliver new services that enhance its accessibility, in terms of primary school and other services.
accessible.	Footway provision can also be provided along the site

	frontage Earlswood train station provides 3 services per hour in the morning peak and 2 in the evening; which provides access to jobs and retail services in Birmingham, Shirley and Stratford The development is of a scale to enhance existing and support new bus services All of these measures increase the accessibility and the resultant scoring of the site Solihull's site assessment
Factors Against	Assessment of land at Earlswood Station
Not in accordance with the spatial strategy.	SMBC have identified that exceptional circumstances exist to release land from to Green Belt to deliver their housing need. The site presents an opportunity to provide homes in a sustainable location which is well served by public transport.
Overriding hard constraints that cannot be mitigated.	There are no overriding hard constraints that cannot be mitigated.
SHELAA Category 3 sites unless demonstrated that concerns can be overcome.	The SHELAA dated November 2016 identified that land around Earlswood Station (site ref 141) fell with Category 1 "(deliverable) – site is suitable, available and achievable and faces no constraints which might prevent it from coming forward within the first five- year period."
Site would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.	The site provides the opportunity to create a strong defensible boundary.
If finer grain accessibility analysis shows the site (or the part to be included) is not accessible.	Means to improve and enhance the accessibility of the site, through a mix of uses and new transport infrastructure, as well as using the existing rail station, demonstrate how the accessibility of the site and the associated scoring can be improved.
If the site is in a landscape character area that has a very low landscape capacity rating.	The site is located within LCA 2 'Southern Countryside' which covers an area of approximately 14km ² to the south of the Shirley area of Solihull. The Landscape Capacity Assessment concludes that: <i>"The LCA being of</i> <i>High overall landscape sensitivity and Medium</i> <i>landscape value, suggests that the LCA would typically</i> <i>have an overall Very Low landscape capacity to</i> <i>accommodate new development".</i>
	The Landscape Character Assessment states that it is

	not possible to establish a definitive baseline sensitivity to change without having details of a given development proposal.
	The Vision Document provides a site specific Sensitivity Analysis which concludes that the proposed development would be acceptable with mitigation.
If the SA appraisal identifies significant harmful impacts.	Land north of Earlswood Station has been assessed within the SA (AECOM ID: AECOM70, SMBC ref: HH3). The SA identified two <i>"Significant negative effects likely</i> <i>/ mitigation essential"</i> namely the fact that the site "contains more than 20ha of agricultural land 1 -2 or >20ha of 1-3b land" and the site is located 1287m from local convenience stores or supermarkets.
	SMBC have identified that exceptional circumstances exist to release land from to Green Belt to deliver their housing need. Such an approach will lead to the loss of agricultural land, the impacts of this loss can be mitigated through the presence of exceptional circumstances.
	The Vision Document provides details of how the site can deliver a 'village core' with the potential for provision of mixed uses close to Earlswood Station. These uses could include a small shop or convenience store to meet the needs of local peoples, and reduce the need for any short trips to be made. Therefore the site would be able to comply with SA19 once delivered.

Chapter 14 'Green Belt'

Question 37: What compensatory provision should be made for land being removed from the Green Belt? Where relevant please give examples that are specific to individual sites proposed for allocation.

- 2.19 Paragraph 138 of the NPPF states that strategic policy-making authorities should "set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land". It is therefore considered that any compensatory provision should be a qualitative provision, such as improved access, rather than a quantitative approach where more land for Green Belt is provided.
- 2.20 As stated in the Vision Document, land around Earlswood Station provides the opportunity to enhance existing public rights of way through the site, allowing the potential to improve accessibility to the remaining Green Belt Land. There is also the

opportunity, due to the wider site control, to maximise the opportunity presented by the existing wider landscape environment including assets such as Clowes Wood and Earlswood Lakes. Such improvements should be considered as compensatory improvements. As such, it is considered that the site performs well against this test.

Chapter 15 'Omitted Sites'

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

- 2.21 Birmingham's adopted Development Plan (2017) identifies a housing shortfall of 37,900 by 2031 to be delivered within its housing market area (HMA). The Strategic Economic Plan for the West Midlands Combined Authority has growth ambitions that require more jobs and around 50,000 more housing across its two HMAs. The Greater Birmingham and Black Country HMA commissioned GL Hearn and Wood PLC to undertake a Strategic Growth Study during 2017 to define how and where this housing could be delivered.
- 2.22 Opportunity areas were identified within the GL Hearn study, including 'South of Birmingham', a broad, non-specific area of land between Birmingham and Stratford upon Avon (location NS5) which was identified as having potential for a new settlement.
- 2.23 It states that the methodology was "applied to rail corridors where there is sufficient land such that development would not result in the physical coalescence between the new settlement and an existing town".
- 2.24 Land around Earlswood Station (site reference 141) is located within the South of Birmingham opportunity area. However, due to the site selection methodology this site was immediately discarded and considered "red". The response to Question 2, set out above, identifies that land around Earlswood Station should have been considered at Step 2 of the site selection process, and when considered against the refinement criteria the site should be considered suitable for allocation.
- 2.25 Step 1 in the site selection process failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF. It is considered that, if the 'Step 1 Site Hierarchy Criteria' has been approached correctly, land around Earlswood Station would have progressed to be considered at Step 2. The site is located on the main railway line between Birmingham and Stratford-upon-Avon, and is therefore in a highly sustainable location, in line with the NPPF 'test' at paragraph 138.
- 2.26 The Vision Document attached at **APPENDIX 2** has been prepared for the site demonstrating how 'Rumbush Village' could deliver a sustainable new village that could result in the following benefits:
 - **Homes:** Up to 500 new homes of diverse tenure, size and type, creating a truly mixed community.

- Landscape: a central component of the development, providing over 11 hectares of open space.
- **Supporting uses:** Opportunity for mixed-use functions to support the existing and future local community, including potentially a primary school.
- **Sustainable Transport:** The site is adjacent to an underutilised railway station, just 25 minutes from both Birmingham and Stratford upon Avon.
- 2.27 SMBC has acknowledged that exceptional circumstances exist and that development within the Green Belt is necessary for them to meet their housing need.
- 2.28 Land around Earlswood Station has the opportunity to contribute towards housing need, in a sustainable location where people want to live, supported by a range of facilities. It is considered that, following a review of the site selection methodology, Land around Earlswood Station would be a suitable site for the provision of new homes within the district.

Chapter 16 'Affordable Housing Policy and Open Market Housing Mix'

Question 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? (and associated comments in response to questions 41 - 43)

- 2.29 It is considered that the proposed approach to affordable housing and market mix is confused and should be reviewed as part of the preparation of the next stage of the Local Plan.
- 2.30 It is standard practice for affordable housing contributions to be calculated as a percentage of the overall number of dwellings and there is no evidence to suggest that the alternative approach of calculating provision based on floorspace would encourage the delivery of a higher proportion of smaller market dwellings.
- 2.31 IM Land do not consider that by calculating the provision of affordable housing on the basis of on-site square meterage this will drive either the provision of a greater number of smaller units, or an increased provision of affordable housing. Experience within the industry is that the use of a square meterage approach does not enhance the delivery of either market of affordable housing. There are a much larger range of factors to take into account when developing an appropriate mix of housing; particularly on large development sites where the creation of a high quality 'place' is critical. This approach reflects the policies set out with the 2019 NPPF.
- 2.32 For the avoidance of doubt IM Land's preference is for the affordable housing requirement to be expressed as a percentage of the overall housing provision on a site.
- 2.33 The Local Plan should deal with the matters of affordable housing requirements and market mix separately. This will ensure a clear position for both the Council and developers reducing the likelihood of overly complex negotiations during the determination of applications.

- 2.34 In terms of the amount of affordable housing to be provided, IM do not consider that the concerns that they have raised previously (in representations attached at Appendix 1) in respect of the link between the identified level of affordable housing need within the SHMA, and the necessity to increase the affordable housing requirement to 50%, has been clearly evidenced or justified.
- 2.35 Furthermore, it is relevant to note that the previous requirement was for the delivery of 50% of dwellings as affordable, 20% or which were to be starter homes. As starter homes are no longer expected to form part of the affordable housing provision, the overall requirements should be reduced to 30%, unless SMBC have robust evidence to demonstrate otherwise.
- 2.36 Any changes in the approach to calculating affordable housing would need to be supported by evidence (including updated viability evidence) justifying the need for and suitability of this change.

Chapter 17 'Responding to this Consultation & Schedule of Questions'

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

- 2.37 As set out earlier in these representations, it is IM's firm view that the Council's approach to this consultation, in terms of considering the various elements of the spatial strategy separately, is flawed. The future development needs of the Borough, in terms of both housing and employment, are fundamentally linked, as are the needs and growth ambitions of the wider area.
- 2.38 By separating out non housing related matters, and by delaying any further consideration of Solihull's contribution towards the Birmingham HMA housing shortfall, it is difficult to determine whether the Council's proposed approach to housing more generally is appropriate. This also throws into question whether any future iteration of the plan can be considered 'sound' if these fundamental elements have not been considered holistically.
- 2.39 With regard to Solihull's contribution towards the wider HMA shortfall, IM confirmed their view in previous representations that a contribution of 2,000 dwellings is not sufficient. Particularly when considering Solihull's strong geographical and migratory relationship with Birmingham. The Council will need to quickly confirm what level of contribution they are intending to make towards the Birmingham HMA shortfall in order to inform whether additional sites over and above those already identified are required.

3. Summary

- 3.1 Overall IM is pleased that Solihull Council is progressing the SLPR and inviting comments on their proposed approach. As set out within these representations, IM Land have concerns about the basis upon which this Supplementary Consultation process has been undertaken.
- 3.2 IM is keen to see a more holistic approach to and consideration of the key factors to be addressed within the DLP. In particular, a more comprehensive approach to housing needs at both the local level and in terms of accommodating a proportion of unmet need from within the wider HMA. It is important that these factors are addressed in order that the Council can be satisfied that the quantum of land they are seeking to identify, and the associated spatial strategy that this will reflect, are sound.
- 3.3 It is considered that Step 1 in the site selection process failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF. It is considered that, if the 'Step 1 Site Hierarchy Criteria' has been approached correctly, land around Earlswood Station would have progressed to be considered at Step 2. The site is located on the main railway line between Birmingham and Stratford-upon-Avon, and is therefore in a highly sustainable location, in line with the NPPF 'test' at paragraph 138.
- 3.4 As set out within these representations, IM Land has a strong preference for affordable housing provision to be identified on the basis of the overall percentage of housing that will be delivered on the site. This approach provides greater certainty to developers and, in IM Land's view, will not undermine the Council's objectives of seeking to increase both density and the provision of smaller dwellings. In any event, these latter two issues should be dealt with separately to affordable housing in line with the 2019 NPPF.
- 3.5 It is important that the overall level of affordable housing to be required by the Council is carefully considered and evidenced through the Local Plan process, and IM Land would welcome further clarity from SMBC on this point.
- 3.6 Land around Earlswood Station has the opportunity to contribute towards housing need, in a sustainable location where people want to live, supported by a range of facilities. It is considered that, following a review of the site selection methodology, Land around Earlswood Station would be a suitable site for the provision of new homes within the district.
- 3.7 IM would be pleased to discuss the content of these representations in further detail with the Council and would welcome the opportunity to arrange a meeting with officers in the short-term to answer some of the queries raised within this response.

Appendix 1: Representations submitted to Draft Local Plan Review Consultation (DLPRC) November 2016

17 February 2017 Delivered by post

Policy and Spatial Planning Solihull MBC Council House Manor Square Solihull B91 3QB

Dear Sir / Madam

DRAFT SOLIHULL LOCAL PLAN REVIEW CONSULTATION (DECEMBER 2016)

We write on behalf of our client IM Land in response to the Draft Solihull Local Plan Review Consultation (December 2016) (DSLPR) which was published for consultation in November 2016.

Our client has interests in land around Earlswood Station. Whilst the site was formerly promoted to the Council in January 2016 through the Call for Sites exercise by Barratt Developments and Bilfinger GVA, an agreement has now been reached between all parties which bring IM Land (part of IM Properties) in as the lead promoter.

These representations, which draw on the supporting evidence, set out IM Land's view with regards to the strategic matters set out in the DSLPR and provide specific commentary on policies included within the consultation document.

This representation responds to two key 'challenges' set out in the DSLPR and are those matters which IM Land consider specific attention in terms of the supporting evidence base and the draft policies. These challenges are:

- **Challenge B** Meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall.
- Challenge H Increasing accessibility and encouraging sustainable transport.

It is relevant to note that IM Land, as part of the IM Group, have also submitted representations in respect of other land ownerships within the Borough. These are consistent with the comments set out below in respect of the strategic, Borough-wide issues.

LAND AROUND EARLSWOOD STATION

IM Land controls approximately 51 ha of land around Earlswood Station. The site is currently located within the Green Belt, however subject to the site being removed from the Green Belt it

is considered that the site could deliver up to 3,000 new dwellings, community facilities including a village hall and shop, a primary school, an extension to the existing car park at Earlswood Station, play areas and green spaces. A site plan showing the location of the site and concept masterplan is provided at **Appendix 1**.

The release of land from the Green Belt in this location provides a key opportunity for the Council to help meet its identified housing needs in this plan period and given the scale of the site the proceeding plan period.

The site is a cross boundary site and falls within the administrative boundaries of both SMBC and Stratford on Avon District Council. As set out on page 9 of this representation Stratford on Avon District Council (SoADC) has signed a Memorandum of Understanding (MoU) to accommodate 3,300 dwellings to help Birmingham address its shortfall. It is considered that this site provides the opportunity for SMBC to work together with SoADC to help meet Birmingham's housing shortfall in a sustainable location.

APPROACH TO STRATEGIC MATTERS

IM Land are supportive of Solihull Metropolitan Borough Council's (SMBCs) decision to review the Local Plan, particularly in the context of the Council not having an adopted Housing Policy and the wider issue of a housing numbers shortfall across the Greater Birmingham Housing Market Area (GBHMA). However there are shortfalls in the Evidence Base which has been published as well as inconsistencies and inaccuracies within the DSLPR which need to be addressed.

The National Planning Policy Framework (NPPF) states that Local Planning Authorities (LPA) should ensure that their Local Plan is based on *"adequate, up-to-date and relevant evidence about the social, economic and environmental characteristics and prospects of the area"* (para 158). SMBC therefore need to demonstrate a clear understanding of the housing, business, infrastructure and environmental needs of the area and the draft policies should be based on this understanding of need.

CHALLENGE B – MEETING HOUSING NEEDS

A number of 'objectives' have been identified by the Council under 'Challenge B'. IM Land considers the following objectives to be particularly important to ensure that the Local Plan Review is sound:

- To ensure that the full objectively assessed housing need (OAHN) for the Borough is met for the plan period consistent with the achievement of sustainable development and the other objectives of the plan.
- To ensure that provision is made for an appropriate proportion of the HMA shortfall in new housing land consistent with the achievement of Sustainable Development and the other objectives of the plan.
- Maximise the provision of affordable housing; ensuring the provision of an appropriate mix, type and tenure of housing on sites in a range of locations which meet the needs of Solihull residents, particularly needs for affordable housing, including Starter Homes, and supported housing on a Borough wide basis.

These key objectives are considered below under the relevant policies and consultation questions set out in the Local Plan.

Draft Policy P5 'Provision of Land for Housing'

Question 14 - 'Do you agree that we are planning to build the right number of new homes? If not why not, and how many do you think we should be planning to build?'

IM Land do not consider that SMBC is planning to build the right number of new homes.

Policy P5 'Provision of Land for Housing' confirms that the Council will allocate sufficient land for at least 6,522 additional homes, to ensure sufficient housing land to a deliver a total of 15,029 additional homes over the plan period (2014-2033). It is IM's view that policy P5 does not provide for sufficient housing to meet the Objectively Assessed Housing Need (OAHN) for Solihull, nor does it provide for an appropriate proportion of the housing shortfall from the GBHMA.

IM recognise that the Council has updated its evidence of housing need through the publication of the 'Solihull Strategic Housing Market Assessment – Final Report' (November 2016).

The Council has set out its justification for the housing requirement proposed within the Draft Plan within its 'Topic Papers'¹. In summary the Council's requirement is based on:

- The SHMA's concluded OAN of 13,093 dwellings (689 dpa) for 2014 to 2033.
- The addition of the backlog generated over the earlier years of the Plan period (2011 2014). This adds an additional 1,184 homes resulting in a need for 14,277 homes over the Plan period 2014 2033 or 751 dwellings per annum; and
- The residual gap between the housing requirement and this assessment of need is stated as represented as addressing the shortfall for needs in Birmingham. This represents an additional 752 units or 40 dwellings per annum which results in the requirement for 15,029 dwellings or 791 dwellings per annum. The Council's Topic Paper suggests that this provides for an additional 2,000 dwellings to meet Birmingham's shortfall, however, the 752 net additional incorporates the 10% market signals uplift concluded within the SHMA as required to address evidence of the imbalance between supply and demand in Solihull.

In this context it is important to assess the robustness and justification of the proposed housing requirement in two separate stages:

• The extent to which it addresses evidenced Local Needs i.e. the OAN for Solihull and in this context the extent to which the requirement set out in Policy P5 provides adequate flexibility to support the 'supergrowth' associated with the realisation of the borough's strategic assets and indeed the wider ambitions of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) and the West Midlands Combined Authority (WMCA); and

¹ 'Draft Local Plan: Topic Papers', SMBC, December 2016

• The adequacy of the allowance made to provide for the accepted shortfall of housing need resulting from the adoption of the Birmingham Plan and the emerging planning picture across the other authorities within the Greater Birmingham Housing Market Area (HMA).

These two aspects are considered separately. It is apparent in both regards that the Draft Local Plan does not present a justified NPPF / PPG compliant evidenced position. On this basis the housing requirement is considered to be unsound as it is currently drafted and justified. SMBC will need to revisit the quantum of housing to be provided for through the Draft Plan.

The OAN for Solihull

The SHMA concludes with an OAN for Solihull of 13,093 dwellings over the period 2014 - 2033 as referenced above. This is indicated as complying with the PPG methodology and on this basis using the methodological steps is based on the following conclusions:

- The 'Starting Point' is correctly identified as the 2014 SNHP which identify a projected growth of 11,607 households. A need for 11,903 dwellings is therefore calculated on the basis of the 2014 SNHP;
- No further demographic adjustments are considered as appropriate in the context of consideration of the factors which have shaped migration or household formation rates.
- No adjustment is considered necessary to support forecast employment growth.
- A 10% upward adjustment to the demographic projection is considered appropriate in response to evidence of worsening market signals, the application of this adjustment to the demographic projection of need forms the basis for the concluded OAN of 13,093 over the period 2014 to 2033.

IM are aware that Barton Willmore have provided a critique of the methodology applied in the derivation of this OAN within the SHMA and have recommended that the Local Plan housing target should be increased to a <u>minimum</u> of 890 homes per annum, which they consider to comply with the PPG and NPPF.

In arriving at this recommendation the study prepared by Barton Willmore highlights a concern that evidence of the sustained projection of household suppression in younger households is not addressed through a positive adjustment. The PPG expressly indicates that the trend-based nature of demographic projections means that such an adjustment is permitted. The SHMA confirms that housing has become absolutely less affordable over the longer-term when compared with other comparator areas and the national picture². The SHMA does not therefore adequately address this specific aspect of the PPG methodology the outcome being that it is likely to underestimate the demographic projection of need.

The OAN presented by Barton Willmore identifies that one of the important constituent factors in indicating a higher level of housing need is the relationship between job growth and population growth. It is recognised that the SHMA seeks to consider the relationship between these two important drivers in detail. However, as set out within BW's critique the SHMA's conclusion that

² 'Solihull Strategic Housing Market Assessment: Final Report', PBA, November 2016, Paragraph 4.48

no additional population / household growth is anticipated to support baseline job growth is considered to represent a significant risk that forecast job growth will not be adequately supported.

The points of critique identify a specific concern relating to the flexing of assumed labour-force behaviour changes within the Experian forecasts which underpin the justification for applying no upward adjustment to support job growth. In this context it is noted that the analysis of the Experian forecasts and an alternative baseline forecast provided by Oxford Economics within the ELR provides an important validation as to this concern, which, despite the issue being raised is unconvincingly dismissed as justifying further consideration. The ELR notes when comparing the preferred Experian baseline forecast (September 2015) and a baseline forecast provided by Oxford Economics that the two forecasting housing models for Solihull show a very different picture as to the relationship between jobs and population growth, namely:

- The Experian forecast implies job growth of 13,300 supported by population growth aligned with the DCLG / ONS population and household projections;
- The Oxford Economics forecasts indicates a lower level of job growth of 8,900 albeit being supported by a higher level of population growth than that projected in the latest ONS / DCLG projections; and
- The SHMA itself appears to recognise the implications of these uncertainties and the application of assumptions used in the methodology noting that this needs to *'be kept under review*³, acknowledging that job growth may be higher and that the labour market in the Functional Economic Market Area (FEMA) may tighten. The Draft Local Plan does not adequately reflect this uncertainty in proposing a more flexible response to providing for housing.

This strongly suggests notably differing labour-force behaviour assumptions being applied within each of the two forecasts. This suggests a degree of uncertainty which supports the need to consider more comprehensively the implications of different assumptions on the balance between jobs and homes rather than limiting the conclusions to the views of one of the forecasting houses (Experian).

As well as recognising the implications of different labour-force behaviour assumptions the scale of forecast job growth over the plan period also represents a critical determinant as to the appropriateness and robustness of the evidence base and its interpretation into sound policy in the Draft Plan. It is important to recognise in this regard that in supporting the growth objectives of the WMCA Solihull is advocating to the Government the capacity to support the delivery of a higher level of job growth on the basis of investment support and the wider success of the sub-region in attracting greater levels of economic growth. This is considered separately below.

Supporting Solihull to 'be economically successful'

The Draft Local Plan establishes a positive economic context and ambition for Solihull. IM support the pro-active visioning within the Draft Local Plan, however, as set out above there is a concern that this ambition is not matched through other draft policies, including the scale of housing to be provided for under Policy P5.

³ 'Solihull Strategic Housing Market Assessment: Final Report', PBA, November 2016, Paragraph 7.26

The Draft Local Plan correctly identifies the significant economic assets which are captured within 'UK Central' (UKC). The UKC Hub, which included the NEC, the airport, Birmingham Business Park, Jaguar Land Rover and the HS2 Interchange site, in particular is recognised as representing a significant driver of future growth.

It is acknowledged within the Draft Local Plan that the Government's commitment to HS2 means that the economic potential of investment should be fully considered. Indeed it states:

"The arrival of the high speed link will have a profound effect on the Borough and this local plan review must address how its benefits can be maximised. This is in the context of the unique opportunity that is available to do so; with the interchange being located at the heart of the Boroughs key economic assets and transport infrastructure."⁴

The Draft Local Plan establishes that:

"The potential of UK Central, to generate further economic and employment growth for the region as a whole is on a nationally significant scale – over 100,000 jobs and £15bn GDP in the West Midlands by 2040 – jobs and growth that are critical to Solihull, its neighbours and to the rebalancing of the national economy."⁵

The potential for investment to generate job growth is recognised within the ELR, which confirms:

"We have looked specifically at the HS2 Interchange site as key site which, to date, has not been [in] employment or substantial employment use; this is expected to change of [over] the plan period and could accommodate significant additional jobs, as well as focussing further critical employment mass in the wider UKC area, including the airport, JLR and BBP."⁶

The ELR does not specifically set out any 'land requirements' associated with supporting growth, but does acknowledge that job growth will be additional to the baseline forecasts 'because it was considered as something that was not anticipated by the forecast i.e. supergrowth'⁷. This is considered further within section 4 of this report.

The SHMA includes a scenario which considers the impact of this 'supergrowth' associated with UKC Hub. It is noted that this is based on job forecasts sourced from the 'UK Central HS2 Interchange Station Growth Strategy Strategic Outline Case (May 2015) ('the SOC'). This is identifying as estimating associated job growth of 16,500 gross additional jobs between 2026 and 2045 with this suggested as resulting in a net growth of 9,286 jobs. The application of displacement / multiplier assumptions results in the SHMA assuming a total net growth of 11,900 jobs within Solihull with 5,336 of these jobs forecast to be created within the Plan period (by 2033).

The SHMA concludes that on the basis of this scale of job growth being assumed and in the context of the adjustments made to respond to demographic and market signals aspects that there is no 'justification for a separate economic uplift to address the UKC Hub, not least

⁴/₋ 'Reviewing the Plan for Solihull's Future: Draft Local Plan', Paragraph 90

⁵ 'Reviewing the Plan for Solihull's Future: Draft Local Plan', Paragraph 37

⁶ Employment Land Review, Final Repot', PBA, January 2017, Paragraph 8.38

⁷ Employment Land Review, Final Repot', PBA, January 2017, Paragraph 5.21

because it will only start to come forward at the very end of the period and the uncertainties surrounding long-term economic impact forecasting of this nature.⁸

IM have a number of specific concerns as to the justification behind this conclusion:

- The assumption that only 5,336 net additional jobs in Solihull are attributable to UKC Hub appears to contrast significantly with the justifying text within the Draft Local Plan as to the scale of ambition for the area and the potential impact of a significant amount of spending on infrastructure;
- The modelling approach taken by Experian applies a number of labour-force behaviour changes which are not adequately justified. For example, changes to economic activity rates and unemployment assumptions beyond the baseline do not appear to have been considered in the context of an acknowledgment in the ELR that the supergrowth in jobs will be concentrated in professional and other private services. The extent to which the skills of the labour-force will match this growth forms an important consideration; and
- In particular it is noted that the Experian modelling assumes a significant increase in net in-commuting into Solihull to satisfy job growth. The modelling assumes that the majority of this additional labour is the result of an increase in people commuting out of Birmingham into Solihull. It is not clear as to the extent to which the implications of this changing labour-force relationship has been considered on Birmingham in the context of its own plans for economic growth.

Collectively this presents a significant concern that the evidence presented within the SHMA does not align with the wider strategy and policy based approach advanced by the Council within the Draft Local Plan and other strategy documents. It is considered that the input assumptions regarding job growth potential and labour-force behaviour need to be reconsidered in the context of the latest information and with consideration of the impacts on the plan-making activities of other authorities in the HMA.

IM Properties are aware in this context that Barton Willmore has, as part of the critique of the OAN in Solihull, modelled the potential level of housing need implied as being required to support the UKC Hub scenario. This confirms a level of need which is notably higher than that associated with supporting the baseline forecast, with a need in excess of 1,000 homes per annum identified as being required by Barton Willmore.

Whilst the above 'supergrowth' associated with the UKC Hub is driven by potential generators of significant employment growth in Solihull it is also important to recognise that these form part of a wider strategy of 'supergrowth' at a larger geographic level.

The WMCA recently published a Strategic Economic Plan (SEP) based on an 'Economy Plus' scenario that aims to create 500,000 additional jobs and secure GVA 5% higher than the national average by 2030. Importantly the WMCA SEP calls for a level of housebuilding significantly greater than currently provided in development plans or being delivered across the West Midlands HMAs.

⁸ 'Solihull Strategic Housing Market Assessment: Final Report', PBA, November 2016, Paragraph 5.39

The Council's evidence base for the Draft Plan confirms the appraisal of economic growth and by implication the impact on housing needs 'does not consider the SEP scenarios in detail⁹'. No justification is provided as to why this is the case given the important commitments being made by the WMCA and therefore Solihull Council to the Government through the Devolution Deal the failure to take into account the implications of stated growth objectives in the new long-term Plan for the borough represents a significant challenge to its relevance and robustness.

The Government's recently published Modern Industrial Strategy confirms the national commitment to supporting the re-balancing of economic growth across the country with this requiring the objectives of the WMCA to be realised:

"More balanced growth across the country can enable higher growth for the United Kingdom overall. The revival of underperforming areas can spur productivity in areas with lower costs, cheaper land, less congested infrastructure, and other underused assets."¹⁰

Indeed the Strategy confirms the importance of both the Northern Powerhouse and Midlands Engine initiatives in delivering 'balanced growth' confirming that the Government will 'be setting out a Midlands Engine Strategy soon' following the recently published Northern Powerhouse strategy whilst also confirming support for the 'the development of proposals for the Midlands Rail Hub'.

The Housing White Paper confirms in its commitment to adopting a more standardised approach to calculating housing need the importance of ensuring that it is consistent with the Modern Industrial Strategy. This will therefore form an important context for the development of subsequent iterations of the Core Strategy¹¹.

Responding Positively to the Shortfall of Housing Need from Birmingham

The Draft Local Plan acknowledges that alongside needs generated within Solihull there remains a significant shortfall in the provision of housing need across the Greater Birmingham HMA.

Following the adoption of the Birmingham Local Plan there is an acknowledged shortfall of housing of 37,900 homes) across the HMA, the majority of which is a direct consequence of Birmingham's failure to accommodate its own need in full. This is higher than the minimum 37,500 shortfall dwellings identified within the 2015 Stage 3 Strategic Housing Needs Study $(SHNS)^{12}$ which was calculated over the period 2011 – 2031.

It is recognised that according to the Stage 3 SHNS that approximately 2,600 of this shortfall was derived from an estimated lack of supply provided for within Solihull. The Draft Plan now implies that the identified supply will meet local needs thereby theoretically offsetting this element of the shortfall. However, it evidently still results in a shortfall across the HMA of in excess of 35,000 dwellings to which Solihull would need to consider its role in accommodating.

Employment Land Review, Final Repot', PBA, January 2017, Paragraph 5.16

¹⁰ 'Building our Industrial Strategy', January 2017

¹¹ 'Housing White Paper – Fixing our broken housing market', DCLG, February 2017, Paragraph 1.12

¹² 'Greater Birmingham and Solihull LEP Black Country Local Authorities: Strategic Housing Needs Study Stage 3 Report', PBA, August 2015

The Draft Plan only provides for 2,000 extra homes to address this shortfall. Even where a shortfall of 35,000 is assumed this equates to less than 6% of the shortfall being accommodated in Solihull. There is no evidenced base justification for this selected scale of shortfall to be accommodated. Even at face value this scale of provision does not appear proportionate given the spatial and strategic relationship between the two authorities.

The following table, which reviews the latest available plan positions and MoUs aimed at addressing the shortfall highlights the collective failure to address this issue across the constituent authorities. It also highlights that a number of other authorities namely, North Warwickshire and Stratford-on-Avon are exploring the potential to accommodate a greater level of shortfall than that proposed in Solihull. As set out elsewhere in these representations, the Earslwood site provides a good opportunity for SMBC to work jointly with SoADC to deliver a sustainable extension to an existing settlement, and in doing so assist in meeting the clearly identified housing need.

Members of MoU	Reference to Birmingham's shortfall
Birmingham and North Warwickshire	MoU signed (September 2016) and published as part of the evidence base to the North Warwickshire Local Plan Review. This confirms that NWBC will aspire to deliver an additional 3,790 dwellings through the new Local Plan to contribute to the wider HMA shortfall. It is noted that this is dependent on the provision of and timely delivery of infrastructure and represents a maximum level of uplift that could be accommodated in North Warwickshire.
Birmingham and Stratford on Avon	The Memorandum of Understanding signed in December 2015 indicates that Stratford-on-Avon will look to contribute 3,300 dwellings towards meeting Birmingham's shortfall.
Coventry and Warwickshire authorities	The MoU deals with Coventry's housing shortfall and how it is to be distributed between the Warwickshire authorities (N.B. Nuneaton and Bedworth have not signed up to the MoU). The distribution of housing needs and the housing requirement to be taken forward includes reference to North Warwickshire and Stratford-upon-Avon's contributions to meeting need from Birmingham.
Redditch and Bromsgrove	The MoU deals with the provision of employment land only.
Lichfield and East Staffordshire	The MoU refers to the Brookhay Villages and Twin Rivers proposals which cross both authorities' boundary. No reference is made to Birmingham's shortfall however the MoU does include a

Table 1.1: Existing MoU position to address Birmingham's Shortfall of Housing Need

	commitment to engaging with the GBSLEP to contribute to the housing evidence base which "seeks to distribute growth to the GBSLEP local authorities".
Tamworth, Lichfield and North Warwickshire	The MoU refers to Tamworth's shortfall being accommodated in both Lichfield and North Warwickshire. No reference is made to Birmingham's shortfall.

Source: Turley, Various, 2016

The progress made to date with regards to commitments either through signed MoU's or published Local Plan's in addressing the shortfall in Birmingham is evidently limited. Most recently the Draft North Warwickshire Plan makes an allowance to test for the provision of 10% of the shortfall, some 3,790 dwellings, which it references as being calculated on the basis of migration and commuting patterns.

As North Warwickshire identify within recent published papers¹³ Solihull has the strongest commuting and migratory relationship with Birmingham of the other authorities in which the Birmingham Plan confirms the shortfall should be sought to be met¹⁴. The ELR analyses travel to work (2011 Census) relationships between Birmingham and Solihull confirming that Solihull provides the largest single inflow of people commuting into to Birmingham with flow of people out from Birmingham into Solihull also significant (the net impact being some 3,000 workers from Solihull to Birmingham). The strength of the relationship is many times more significant than that with North Warwickshire and so the application of a comparable methodology for distributing shortfall would suggest that Solihull should take a much greater share. This is evidently not explored within the underpinning evidence or the Draft Local Plan.

It is of concern that North Warwickshire has already started to identify specific concerns in this regards as to the adequate application of the Duty-to-Cooperate with the papers referenced above confirming that this 'is considered a potentially serious failing in the Plan in terms of adequately addressing the 'Duty to Co-operate', given the clear shortfall in need identif[ied] in the Birmingham City Local Plan, noted in the proposed Modifications to the Plan, and the comments from the earlier Solihull Local Plan Inspector'.

It is of note that the Draft North Warwickshire Local Plan confirms that work has been progressed between the partners across the Greater Birmingham & Black Country HMA to agree a redistribution of the identified shortfall. The result being a draft Memorandum of Understanding (MoU) to agree the distribution of housing amongst the local planning authorities from both in and outside of the HMA. Whilst North Warwickshire has published a MoU to date no wider MoU has been made available which establishes the share of distribution to Solihull.

The Draft Local Plan recognises that the authority 'plays a vital role in the regional economy and labour market^{,15}. Evidently where a more positive approach was adopted within the Draft Local Plan to support the full potential economic growth associated with its strategic economic assets,

¹³ 'Report of the Assistant Chief Executive and Solicitor to the Council' to the Planning and Development Board 16 January 2017, Paragraph 5.1

Alongside Solihull this includes The Black Country, Bromsgrove, Redditch, North Warwickshire, Tamworth, Lichfield, Cannock Chase, South Staffordshire and parts of Stratford-on-Avon. ¹⁵ 'Reviewing the Plan for Solihull's Future: Draft Local Plan', Paragraph 30

including the UKC Hub, this would also mean that the authority accommodated a more reasonable and justifiable level of the overall shortfall of housing need across the HMA. It is considered that this would have significant benefits in ensuring the sustainable distribution of housing and employment growth within the HMA.

Implications for the Local Plan

IM considers that the Draft Local Plan does not provide for a sufficient level of new housing under policy P5.

The Housing White Paper establishes the Government's commitment to 'get more homes built right now' and ensure that 'the right homes in the right places' are being planned for¹⁶. This presents an important context for the subsequent development of the Draft Plan.

Whilst the stated aim of meeting local needs within Solihull is supported it is considered that the full scale of this need is under-estimated within the evidence base upon which the Draft Plan is based.

IM are aware that the evidence prepared by Barton Willmore highlights a number of specific methodological and technical points of challenge to the SHMA and its conclusion on the OAN for housing in Solihull. The BW analysis recommends that the Local Plan housing target should be increased to a <u>minimum</u> of 890 homes per annum to respond to the OAN for housing. This is some 12.5% higher than that currently provided for within the Draft Plan.

Specific concerns have been highlighted which suggest that the Plan fails to adequately align its economic and housing policies, a key requirement of the NPPF (Paragraph 158) with insufficient flexibility in its planned level of housing growth to support its economic potential. The authorities commitment to and ambition for supporting economic growth are strongly supported. Solihull plays an important role in realising the growth objectives of the WMCA with the planned infrastructure investment through HS2 in particular representing a fundamentally different context for attracting investment and business expansion.

The Draft Local Plan as currently drafted, however, fails to adequately consider the wider infrastructure implications of the full potential of investment being realised. There is a need for the Plan to adopt a more pro-active response to planning for growth to ensure it remains fit for purpose over the longer-term and provides a strong foundation both within and beyond the plan period.

In this context it is critical that the Plan recognises Solihull's responsibility to support needs across the wider HMA. The failure to provide any evidenced based justification to support the approach proposed to accommodate less than 6% of the identified shortfall across the GBLEP area undermines the soundness of the Plan. This approach stands in direct contrast, for example, with North Warwickshire where a MoU has been signed with Birmingham Council and provision is being explored through the Draft Plan to accommodate approximately 10% of the shortfall. Solihull's location and housing market and economic linkages with Birmingham are far stronger than comparable linkages with North Warwickshire and the difference in the scale of shortfall to be accommodated cannot therefore be viewed as proportionate or reasonable.

¹⁶ 'Housing White Paper – Fixing our broken housing market', DCLG, February 2017, Pages 7 and 14.

Question 11: Do you agree with Policy P4? If not why not and what alternative would you suggest?

Policy Overview

IM recognises the need for both affordable and market housing across the borough as identified by the 2016 Strategic Housing Market Assessment (SHMA) and outlined within the draft policy commentary and justification.

The policy begins by recognising the social and economic importance of housing to the Borough which is supported by IM.

IM also welcomes the inclusion of Vacant Building Credit (VBC) within draft Policy P4. It forms a valuable incentive for the redevelopment of brownfield sites.

IM's overriding concern is that proposed Policy P4 will threaten the viability and deliverability of residential development. The implication for the Local Plan is a significantly heightened risk posed to successfully achieving the identified overall housing requirement.

A summary of IM's comments and recommendations to each aspect of proposed Policy P4 follow in answer to the above question. More detailed commentary is provided in response to Questions 12 and 13.

Part A: Affordable Housing

Whilst IM is in agreement with the minimum scale of developments required to provide affordable housing, IM has significant concerns regarding the following aspects of draft Policy P4:

- The un-tested and un-evidenced increase in the affordable housing requirement from 40% to 50% on sites of 11+ units or exceeding 1,000m² (GIA);
- The absence of an upper limit to the proposed affordable housing requirement;
- The ambiguity within the current wording of draft Policy P4, which makes interpretation unclear and introduces uncertainty for application;
- The untested proposed tenure split within the affordable housing requirement;

Part C: Market Housing

IM has significant concerns regarding the proposals within draft Policy P4 for SMBC to seek to dictate or negotiate the types and sizes of open market housing to be delivered on allocated and unallocated sites across the Borough.

IM considers that this points towards a continuation of the policy approach set out within the current SMBC 'Meeting Housing Needs' Supplementary Planning Document (SPD), which stipulates minimum thresholds for the provision of 1-bed and 2-bed dwellings across the borough. This policy approach is considered to be highly onerous and based upon a weak evidence base.

In addition, having reviewed the SHMA (2016), IM is of the view that this will not provide the necessary evidence for SMBC to understand the existing mix of market housing and housing demand locally to a site, in order to seek the 'rebalance' any deficiencies in existing supply.

IM has replicated Figure 6.1 of the SHMA (2016) within Table 1.2 overleaf. This presents the borough's housing requirement by dwelling size and tenure over the 2014-2033 period – as identified by the SHMA (2016). This demonstrates that borough-wide there is an overall requirement for 62% of open homes to have 3+ bedrooms, with the residual 38% of market homes required to have 2 bedrooms or fewer.

The SHMA (2016) does not appear to disaggregate this analysis to a lower geographical scale within any published evidence. The SHMA (2016) evidence published to date is limited in its ability to accurately stipulate requirements to 'balance' demand and supply for market homes locally, and forms a 'point in time' analysis that will quickly become outdated.

It is IM's express view that whilst SMBC should seek to encourage appropriate delivery of dwelling types and mixes across market housing in response to local needs via the preapplication process, a policy approach that seeks to dictate fixed percentages of market housing size/type provision is flawed and inappropriate to respond to fluctuations in market conditions.

Moreover, SMBC has not published appropriate evidence on viability to test the impact of this aspect of draft Policy P4 on the deliverability of sites. It must be demonstrated that the combined costs of planning policy do not undermine the deliverability of sites and pose a risk to the Local Plan.

In summary, it is IM's request that SMBC removes any reference within the draft Policy P4 of the Draft Local Plan to assessing or negotiating the market mix of housing proposed on allocated or unidentified sites.

Table 1.2:	Replication of Figure 6.1 from the Solihull SHMA (2016) in Table Format – Housing Requirement (2014-2033)

Figure 6.1 - SHMA (2016)	Units by Tenure		% by Tenure					
Unit Size/Type	Market	SO	AR/SR	Market	SO	AR/SR	Total Units	Total %
1 bed flat	434	134	679	4%	14%	24%	1,247	9%
1 bed bungalow	287	48	208	3%	5%	7%	543	4%
2 bed flat	1,343	276	130	13%	28%	5%	1,749	12%
2 bed bungalow	400	38	259	4%	4%	9%	697	5%
2 bed house	873	162	168	8%	16%	6%	1,203	8%
3 bed house	3,473	196	833	33%	20%	29%	4,502	32%
4+ bed house	3,627	129	571	35%	13%	20%	4,327	30%
Total	10,437	983	2,848	100%	100%	100%	14,268	100%

Source: Solihull SHMA (2016)

Turley

Part D: Self and Custom-build Housing

IM supports the inclusion of these development types within draft Policy P4.

IM notes that draft Policy P4 contains two proposed 'options' – numbered 1 and 2 – upon which SMBC is inviting comment. It is IM's view that a variant of Option 2 would be preferable.

The variation recommended by IM would be for developers of allocated sites to make a 5% contribution to Self and Custom Build Housing on larger residential sites of 500+ units or via voluntary agreement between the developer and SMBC on sites falling below this threshold.

The rationale for this recommendation is provided by way of further commentary in response to Question 13.

Question 12: Do you agree with the level of affordable housing being sought in Policy P4? If not why not and what would you suggest?

Affordable Housing Requirement Threshold

IM is in agreement with the extent of the affordable housing provision threshold proposed by the Council.

Draft Policy P4 proposes that affordable housing provision will not be sought from developments delivering fewer than 11 residential units or 1,000 square meters (GIA).

IM supports this component of draft Policy P4 as it is in line with both national Planning Practice Guidance (PPG) and the Written Ministerial Statement (WMS) of 28th November 2014¹⁷ implemented to alleviate constraints to local housing supply and support small scale development.

Proposed Increase to 50% Affordable Housing Requirement

IM is highly concerned with the proposed increase in the affordable housing requirement to 50% within draft Policy P4.

It is understood that this proposed increase by 10%, from 40% in the adopted Local Plan, is in response to the level of affordable housing need identified within the SHMA (2016).

The SHMA (2016) identifies a total borough-wide need for affordable housing of 210 dwellings per annum over the Local Plan period (18 years) within Table 5.10 on p.52.

The SHMA (2016) recommends that the full OAN for Solihull is either 13,094 or 14,278 dwellings (689 or 751 dpa) over the period 2014 to 2033 (18 years). It concludes that no adjustment to the OAN is required to accommodate affordable housing needs.

Consequently, the annual affordable housing requirement of 210 dwellings per annum equates to either 31% or 28% of the full annualised OAN – depending on whether the lower or upper OAN figure from the SHMA (2016) is utilised.

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¹⁷ The Minister of State for Housing and Planning (2014) "House of Commons: Written Statement HCWS50" Department for communities and Local Government,"



On this basis, IM does not consider that the link between the identified level of affordable housing need within the SHMA, and the necessity to increase the affordable housing requirement to 50% within draft Policy P4 to meet identified needs, has been clearly evidenced or justified within the SHMA (2016) or the Local Plan Review document.

Policy P4 of the adopted Local Plan is underpinned by the Affordable Housing Viability Study (2012) (AHVS), which was prepared by CBRE.

The AHVS (2012) is now considerably out of date – it is no longer reflective of current development costs, sales values, landowner expectations, and planning policy costs. In addition, it does not provide SMBC with any evidence of the financial viability of residential development sites when subject to an affordable housing requirement of 50% of the total units.

The AHVS concludes within paragraphs 7.18-19 that a 40% affordable housing requirement should be the maximum set within Policy P4 of the adopted Local Plan:

"In summary, the analysis that we have undertaken demonstrates that the delivery of a 40% affordable housing contribution in the south of the Borough is generally achievable taking into account the types and size of sites coming forward for development. We consider that fixing the rate above 40% or stating a requirement of at least 40% would be a deterrent to development and result in protracted negotiations with developers and landowners.

We consider therefore that the Council should consider fixing the affordable housing percentage rate at 40%".

There is hence no evidence base prepared to demonstrate that the provision of 50% affordable housing is viable and deliverable across the majority of sites necessary to achieve the objectives of the Local Plan Review. Presently, this component of draft Policy P4 poses a major risk to the Local Plan.

In order to accord with both paragraph 173 of the NPPF and PPG it will be necessary for SMBC to prepare appropriate evidence on viability to test the impact of the draft policies within the Local Plan Review (including affordable housing), on the deliverability of sites. It must be demonstrated that the combined costs of planning policy do not undermine the deliverability of sites and pose a risk to the Local Plan.

The evidence base should be published by SMBC as part of a future round of consultation on the Local Plan Review, for scrutiny and formal comment from stakeholders.

It is IM's view that if this appropriate evidence cannot be produced by SMBC, then there is no justification to increase the affordable housing requirement from 40% as presently set within Policy P4 of the adopted Local Plan.

Upper Limit to Affordable Housing Requirement

Draft Policy P4 does not presently place a clear upper limit on the affordable housing requirement sought by SMBC. To give certainty to the development industry, the policy wording should be altered to the following:

"Contributions will be expected to be made in the form of <u>up to</u> 50% affordable dwelling units on each development site, but will take into account:"



It should be made clear within the draft policy wording that the affordable housing requirement sought by SMBC will not exceed the rate set within the Local Plan policy.

Lack of Clarity in Policy Wording

IM considers that draft Policy P4 of the Draft Local Plan currently contains several statements that are relatively unclear and ambiguous in their interpretation.

The draft policy states that SMBC will "take into account" the various following factors when considering the application of the 50% affordable housing requirement on specific sites:

- **'Site size'**: It is unclear how this will be factored into SMBC's considerations in applying policy. Will smaller sites be permitted with a reduced affordable housing provision, or will larger sites? What, specifically, is the flexibility being proposed within the draft Policy?
- **'Accessibility to local services and facilities and access to public transport**': Is SMBC suggesting that sites with limited accessibility will be permitted to provide off-site contributions towards affordable housing, rather than on-site provision? If this is the case, or indeed if there is an alternative rationale, this should be clarified.
- **'The economics of provision, including particular costs that may threaten the viability of the site'**: IM welcomes the inclusion of this statement, but would encourage SMBC to alter the wording to replace the term 'economics' with the term 'financial viability'.
- **'The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities'**: It is unclear as to how SMBC will apply this part of the draft Policy. Will affordable housing requirements be reduced in regeneration areas of the borough or settlements with a high proportion of smaller, or affordable, housing stock? If this is the case, or indeed if there is an alternative rationale, this should be clarified.

Understanding the implications of these aspects is critical for the development industry and greater clarity is sought and should be provided by SMBC. It is particularly relevant where large strategic sites, such as Earlswood, are being planned.

This clarity should either be provided directly within draft Policy P4 or it should be stated within the policy that the full details will be set out within supplementary guidance – such as an updated 'Meeting Housing Needs' Supplementary Planning Document (SPD). The updated SPD should also be consulted upon alongside the Draft Local Plan.

Financial Contributions in Lieu

IM is supportive of the inclusion within draft Policy P4 of a mechanism for meeting affordable housing requirements via financial contributions, in lieu of on-site provision, where on-site provision is not feasible or viable.

IM would recommend that greater clarity should be provided by SMBC within draft Policy P4 to confirm that the scale of financial contributions towards the affordable housing requirement will be subject to, and dependent upon, site specific assessment of financial viability.

It would also be beneficial for the development industry to understand SMBC's approach to expenditure of financial contributions collected. Specifically, how such contributions will be spent and whether expenditure will be tied to locations in proximity to the contributing development site or focused in specific



geographic locations across the borough. Clarification should be provided directly within supplementary guidance – such as an updated 'Meeting Housing Needs' Supplementary Planning Document (SPD). The updated SPD should also be consulted upon alongside the Draft Local Plan.

Affordable Mix

The policy justification for draft Policy P4 within the Draft Local Plan states that the 50% requirement for affordable housing should equate to a 20% requirement towards Starter Homes, 22% towards rented and 8% shared ownership in response to evidence presented within the SHMA (2016).

The tenure mix is not set out within draft Policy P4 itself. If the intention of SMBC is to allow flexibility via its exclusion, it should be stated within the policy that the affordable tenure mix will be set out within supplementary guidance – such as an updated 'Meeting Housing Needs' Supplementary Planning Document (SPD). The updated SPD should also be consulted upon alongside the Draft Local Plan.

IM considers that it is unclear how SMBC has utilised the SHMA (2016) to arrive at a division of 22% rented and 8% shared ownership. This is neither stated within the SHMA (2016) or the policy justification within the Draft Local Plan. SMBC should provide greater clarity within an explanatory note, or expansion of the policy justification for draft Policy P4 within the Draft Local Plan.

The policy justification for draft Policy P4 within the Draft Local Plan does not make it clear to the development industry whether 'rented' affordable housing sought by SMBC will represent social rent or affordable rent, or an element of both. Greater clarity should be provided to the industry via expansion of the policy justification for draft Policy P4 within the Draft Local Plan. It would be IM's recommendation for 'rented' to incorporate affordable rent (up to 80% open market rents), both to improve the deliverability of sites and stimulate greater housing choice within the borough's affordable stock.

The policy justification for draft Policy P4 within the Draft Local Plan confirms that the proposed affordable housing requirement (50%) and tenure mix has not been subject to an assessment of viability. It is stated instead by SMBC at paragraph 193 that: *"...further evidence will be pursued to justify this".*

PPG is clear that viability assessment is necessary to ensure that Local Plan policies are realistic and provide high level assurance that plan policies are viable. Evidence must be prepared to assess the likely ability of the market to deliver the plan's policies – whilst at draft stage. It is critical that SMBC prepares and publishes for consultation the viability evidence to underpin the proposed Draft Local Plan policies.

IM would also comment that, whilst it is positive that SMBC has sought to be proactive by incorporating Starter Homes within draft Policy P4 of the Draft Local Plan, the use of Starter Homes as part of the justification for increasing the affordable housing requirement to 50% is clearly both un-evidenced and is also premature.

To date, Starter Homes do not have the necessary secondary legislation in place to permit legal delivery (with the exception being limited to Starter Homes 'exception sites').

Furthermore, the Housing White Paper published in February 2017 confirms that the Government will not introduce a statutory requirement for starter homes at the present time. Instead we local authorities will deliver starter homes as part of a mixed package of affordable housing of all tenures that can respond to local needs and local markets.

Notwithstanding, as the NPPF is yet to be amended, Starter Homes currently remain outside of the definition of affordable housing and the need for the secondary legislation to be consulted upon and be



considered within both the House of Lords and House of Commons before enactment, would mean that it could be a substantial period before Starter Homes can be legally permitted and delivered.

It is IM's recommendation that SMBC awaits details of Starter Homes to be provided by government, and then prepares viability evidence to determine the potential scope for introducing Starter Homes into the affordable housing mix, and the implications for deliverability and the overall affordable housing requirement.

Question 13: Which option for delivering self and custom house building do you favour and why? If neither do you have any other suggestions?

IM recognises the potential role and contribution towards new housing supply provided by the delivery of self-build and custom homes. This development type is supported by paragraphs 50 and 159 of the National Planning Policy Framework (NPPF), the government's Written Ministerial Statement of 28th November 2014¹⁸ and the Housing and Planning Act 2016¹⁹.

Draft Policy P4 contains two proposed 'options' – numbered 1 and 2 – upon which SMBC is inviting comment. It is IM's view that a variant of Option 2 would be preferable.

The variation recommended by IM would be for developers of allocated sites to make a 5% contribution to Self and Custom Build Housing on larger residential sites of 500+ units or via voluntary agreement between the developer and SMBC on sites falling below this threshold.

The rationale for this recommendation is as follows:

- The commentary within paragraph 210 of the Draft Local Plan confirms that there were 91 people registered on SMBC's Self and Custom Housebuilding Register at the 30 September 2016, which was established in Solihull in March 2016. This represents a weak and potentially inflationary indicator of demand, with any party able to register interest rather than demonstrable need. There is no firmer evidence provided within the SHMA (2016).
- Should the larger residential allocations of 500+ units (as identified within the 'Summary Table of Allocated Sites' within the Draft Local Plan) be required to provide a 5% contribution to Self and Custom Build Housing, this would yield circa 109 plots, which would exceed SMBC's registered demand by 20% - a comfortable buffer.
- It will be more practical to deliver serviced plots on larger sites. Plots can be identified within a distinct phase, or sub-phases, which would both make servicing more straightforward as well as allow for alignment with practical considerations of the CIL Regulations (i.e. not triggering CIL liability upon commencement of the wider site). Where impractical for delivery, the draft Policy P4 should be revised to allow for an off-site provision/commuted sum as an alternative.
- The lack of demonstrable firm demand, and track record of delivery within the borough, will
 increase the risk to viability of sites providing serviced plots as the appetite for sales is
 presently highly uncertain. SMBC has not prepared any evidence to demonstrate that this
 policy requirement will not pose a risk to the deliverability of sites required to meet the
 objectives of the Local Plan. This evidence of financial viability should be prepared and
 formally consulted upon.

¹⁸ The Minister of State for Housing and Planning (2014) "House of Commons: Written Statement HCWS50" Department for communities and Local Government

¹⁹ The UK Government (2016) "The Housing and Planning Act 2016."



It is noted, and welcomed, that plots will be required to be marketed for 12 months. However, it should be made clear within draft Policy P4 that, following the 12 month marketing period, plots could be built out by the developer and sold on the open market as traditional volume housing.

CHALLENGE H – INCREASING ACCESSIBILITY AND ENCOURAGING SUSTAINABLE TRANSPORT

A number of 'objectives' have been identified by the Council under 'Challenge H'. IM Land considers the following objectives to be particularly important to ensure that the Local Plan Review is sound:

- Improve accessibility and ease of movement for all users to services, facilities, jobs and green infrastructure
- Manage transport demand and reduce car reliance

These key objectives are considered below under the relevant policies and consultation questions set out in the Local Plan.

Draft Policy P7 'Accessibility and Ease of Access'

•

Draft Policy P8 'Managing Travel Demand and Reducing Congestion'

Question 18. Do you agree with the policies for improving accessibility and encouraging sustainable travel? If not why not, and what alternatives would you suggest? IM Land agree in part with Draft Policies P7 and P8.

IM Land support the Council's aspiration at Policy P7 that all new development should be focussed in the most accessible locations and seek to enhance existing accessibility levels and promote ease of access. However, it is important to ensure that sites that can be made more accessible are also considered, particularly in the context if the scale of housing need identified earlier in these representations. IM Land consider that as part the Council's aspirations to deliver development in accessible locations particular consideration should be given to existing transport hubs (e.g. Earlswood) and settlements that perform well against the Council's accessibility criteria should be afforded significant weight when seeking to allocate development.

Draft Policy 8 confirms that the Council will support development proposals which are located in accordance with the spatial strategy and which seek to reduce the need to travel and that essential travel can be met by forms of sustainable transport in addition to the private car.

The Draft Policy also sets out that the Council will support proposals for local Park and Ride at appropriate railway stations subject to other policies in the Local Plan.

Development around Earlswood Station will help encourage the use of the rail network and consequently reduce reliance on use of the private vehicle. The provision of a school and community facilities such as a shop and village hall in this location will also reduce the need to travel to.

Whilst it is not proposed that a Park and Ride facility would be provided as part of the development proposals it is proposed that development in this location would allow for an extension to be made to the existing car park which serves Earlswood Station. Providing additional car parking spaces in this location will mean that the station can be utilised by a greater number of people which would result in fewer car journeys as a result of being able to use a different mode of transport.

Turley

EVIDENCE BASE DOCUMENT

IM Land also wishes to comment on the following evidence base documents:

Greater Birmingham and Solihull LEP Black Country Local Authorities – Strategic Housing Needs Study Stage 3 Report (August 2015)

A Strategic Housing Needs Study (SHNS) was identified as part of the evidence base needed to move forward the GBSLEP Spatial Plan for Growth and the scenarios shaped by the Urban Structure Theme Group. The SHNS was split into three stages with Stages 1 and 2 looking at demographic need and current supply and the third stage considering options for meeting the shortfall.

The Stage 3 report considers six spatial options for distributing the shortfall. One of the six options considered was to 'Public Transport Corridors' which focusses on distributing the shortfall according to spare capacity and growth potential in the rail network.

The principal conclusions to the study acknowledged that there is a supply of land outside the conurbation around public transport hubs which could be accessible to jobs and where market demand is highest but that most of this area is currently constrained by Green Belt.

Land at Earlswood is adjacent to the existing Earlswood Station and so clearly meets the option identified in the report that development around transport hubs provides a suitable option of addressing identified housing need.

Solihull Strategic Green Belt Assessment Report (July 2016)

SMBC commissioned Atkins Limited to carry out a strategic review of the Green Belt as part of the early review of the Solihull Local Plan.

Two categories of assessment were used to compile to the report; Refined Parcels and Broad Areas. Land at Earlswood falls within two Broad Areas; BA01 and BA6. The land within Broad Area BA6 was not assessed in the report as this land was considered through the Coventry and Warwickshire Joint Green Belt Study Stage 2. In total five Broad Areas were assessed through the report.

BA01 scores the lowest of the five Broad Areas assessed. The site scores 6 out of a possible 12 which is significantly lower than the other scores awarded to the Broad Areas with BA02 scoring 9, BA03 and BA04 scoring 12 and BA05 scoring 11.

The assessment notes that the Broad Area is largely characterised by countryside and is the lowest performing of the Broad Areas because it does not form part of a strategic gap and its boundaries are easily identifiable. It is noted that when considered alongside the Broad Area 6 it does play a role in checking the urban sprawl of Solihull from the north and Redditch from the south. The Broad Area does not perform against purpose 4 of the Green Belt; to preserve the special character of historic towns and consequently scores 0 against this purpose.

The assessment makes it clear that the Green Belt in this location performs poorly against the purposes of the Green Belt when considered against all other Broad Locations within the Borough.

Solihull Local Plan Review Interim Sustainability Appraisal Report (January 2017)

The Interim Sustainability Appraisal accompanies the Draft Local Plan Review. The appraisal considers 30 hectares of the total site area (i.e. land which falls within SMBC's administrative boundary) and is afforded the references AECOM70 (AECOM ID) and HH3 (SMBC Reference).



A positive effect is awarded against two objectives; proximity to bus and trains service and access to leisure facilities.

The site is awarded a neutral score against nine of the 17 sustainability objectives, including; proximity to local road network; minerals; flooding; enhance ecological sites; distance to primary school; enhance green infrastructure; amenity; distance to heath care; distance to key economic assets.

The site is produces a significant negative effect in just two objectives; soil and distance to convenience stores or supermarket.

The site is proposed to be developed for mixed use and will include the provision of a local shop. This will mitigate the current negative effect in respect of the distance to convenience stores and further demonstrates the sustainability of this location.

SUMMARY AND CONCLUSIONS

IM Land have reviewed SMBC's housing evidence base and are of the view that Draft Policy P5 of the DSLPR does not set an appropriate housing delivery target for the Borough over the plan period.

IM are aware that the evidence prepared by Barton Willmore (BW) highlights a number of specific methodological and technical points of challenge to the SHMA and its conclusion on the OAN for housing in Solihull. The BW analysis recommends that the Local Plan housing target should be increased to a minimum of 890 homes per annum to respond to the OAN for housing. This is some 12.5% higher than that currently provided for within the Draft Plan.

In addition, the Draft Plan only provides for 2,000 extra homes to address the housing shortfall across the GBHMA. Even where a shortfall of 35,000 is assumed this equates to less than 6% of the shortfall being accommodated in Solihull. There is no evidenced base justification for this selected scale of shortfall to be accommodated. Even at face value this scale of provision does not appear proportionate given the spatial and strategic relationship between the two authorities.

In terms of affordable housing, Draft Policy P4 suggests an increase from 40% provision to 50% provision. There is no evidence to suggest that this increase is necessary. The Council should be aware that setting too high affordability threshold may impact negatively on the viability of schemes which could in turn delay or prevent them from coming forward which would then have implications on the Council's ability to meet its housing needs.

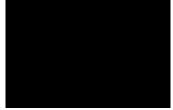
These representations also review the Council's Accessibility and Travel Policies and bring to the Council's attention that development around existing transport hubs can help achieve the Council's policy in this respect. It is clear from the SHNS Study Stage 3 that development around transport hubs should be considered as an option for accommodating the authorities housing need. It is clear from reviewing the Green Belt Assessment (2016) and the Interim Sustainability Appraisal (2017) that land around Earlswood is a suitable location for helping SMBC meet its housing needs both now and in the future. It is recommended that the Council applies a balanced approach to the distribution of development, including allocating development at existing transport hubs and sustainable settlements such as Earlswood.

Overall, IM are supportive of the Council's intention to Review the Solihull Local Plan, however there are clear and significant shortcomings in the evidence base which must be reconciled in order to ensure that the DSLPR is robust. In line with the comments provided within these representations, the Council should revisit their evidence base and ensure that their housing and employment allocations are reflective of the economic / social context and align with Solihull's overarching vision for growth.



I trust that you find the representations provided above helpful. Should you wish to discuss the contents of these representations in further detail please do not hesitate to contact me or my colleague Angela Reeve.

Yours sincerely



Kathryn Young Senior Planner

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Turley

Appendix 1: Initial Concept Masterplan



NOTESThis drawing is the copyright of Thrive Architects Ltd ©. All rights reserved.Ordnance Survey Data © Crown Copyright. All rights reserved.Licence No. 100007359. DO NOT scale from this drawing.Contractors, Sub-contractors and suppliers are to check all relevantdimensions and levels of the site and building before commencing any shop drawings or building work. Any discrepancies should be recorded to the Architect.Where applicable this drawing is to be read in conjunction with the Consultants' drawings.REVDESCRIPTIONDATEAUTHORCHK'D			
KEY Site Boundary Community Facilities Primary School Residential (Lower Density) Residential (Higher Density) Residential (Higher Density) Proposed Green Space Childrens Play Areas Swales Primary Vehicular Route Rey Pedestrian Routes Peelopment Gateways Greenspace Gateways Landscape Buffer Extension to Train Station Car Park Proposed Location for New			
Pedestrian Railway Bridge			

Appendix 2: Vision Document for Rumbush Village, March 2019

Rumbush Village

A blueprint for sustainable living

March 2019



Node Imperial & Whitehall 23 Colmore Row Birmingham B3 2BS thisisnode.com | 0121 667 9259

Prepared on behalf of IM Land by Node Project Ref: IML0264 Document Ref: IML0264 VISION.indd

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DATE	COMMENT	CREATED BY	CHECKED BY	VERSION
19.10.2018	Draft to team	KK	KK	1
19.11.2018	Revised draft	KK	KK	2
13.03.2019	Draft for submission	KK	KK	3



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1. Introducing Rumbush Village

We are proposing the creation of Rumbush Village: a sustainable village located around an underutilised railway station.

This site vision has been prepared by Node on behalf of IM Land, an experienced land promoter and developer, with a track record of delivering excellence in residential, employment and mixed-use schemes. It has been prepared with technical input from a skilled and experienced design team, comprising:

Turley: planning

PBA: transportation and engineering

EDP: ecology and archaeology

Barton Willmore: landscape and visual impact

A vision of healthy, happy sustainable living

Rumbush Village has the chance to deliver something truly special.

The development could deliver a sustainable new village that can result in the following benefits:

Homes

Up to 500 new homes of diverse tenure, size and type, creating a truly mixed community.

Landscape

A central component of the development, providing over 11ha of open space.

Supporting uses

Opportunity for mixed-use functions to support the existing and future local community.

Sustainable transport

The site is adjacent to an underutilised railway station, just 25 minutes from both Birmingham and Stratford.

The context for development

The West Midlands urgently needs new homes.

Birmingham's adopted Development Plan (2017) admits a housing shortfall of 37,900 by 2031 to be delivered within its housing market area (HMA). The Strategic Economic Plan for the West Midlands Combined Authority has growth ambitions that require more jobs and around 50,000 more homes across its two HMAs. The Greater Birmingham & Black Country HMA commissioned GL Hearn and Wood Plc to undertake a Strategic Growth Study during 2017 to define how and where this housing could be delivered. Opportunity areas were identified within the study, including 'South of Birmingham', a broad, non-specific area of land between Birmingham and Stratford upon Avon (Location NS5) which was identified as having potential for a new settlement.

It states that the methodology was 'applied to rail corridors where there is sufficient land such that development would not result in the physical coalescence between the new settlement and an existing town.'

Rumbush Village has the opportunity to deliver this ambition and contribute towards housing need, in a location where people will want to live, supported by a range of facilities that will allow them to live sustainable and fulfilled lives.



2. Approach

Our approach

We put people first. Putting people at the heart of everything we do means designing places that are practical and a joy to be in.

Rumbush Village provides an opportunity to create a bespoke new settlement that will deliver beneficial rather than detrimental consequences for its existing setting.

To achieve this requires a strong, clear philosophy and vision from the outset, supported by holistic, contextual understanding of place and articulated through well-defined design principles. We believe that setting the bar high and clearly communicating this strong vision provides the optimal means of exciting partners, the local community and wider parties into playing a part in a success story that has the potential to benefit all.

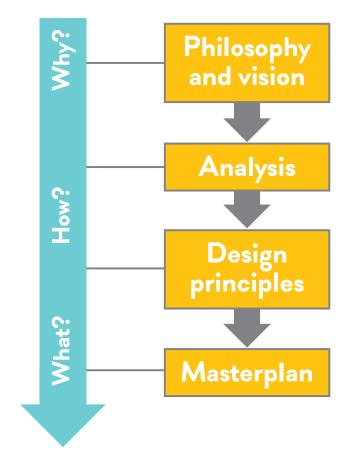
As such, we have followed a process that defines:

why we are doing it.

how we plan to do it.

what it will entail.

This process has ensured that a people-led, place-specific vision has guided the development of our proposals at every step.





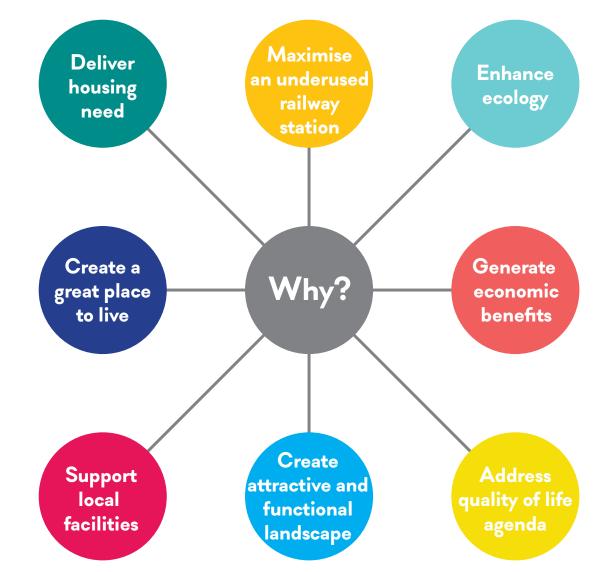
3. Our philosophy

Why develop?

Our starting point for the design process is to holistically define a core rationale for developing the site.

This spans factors from providing much needed homes and economic benefits to ensuring that the scheme has a positive impact on its landscape and ecological environment.

Fundamentally our principal reason why is to leave a lasting legacy of a unique, sustainable and viable village which actively addresses quality of life.



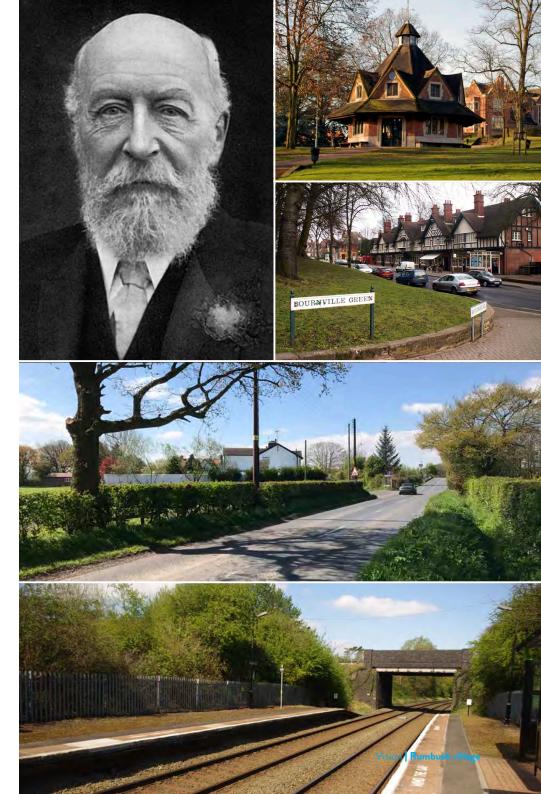
Governing philosophy

The site has the potential to proactively deal with the challenges facing 21st century England, including a deepening housing crisis, rising obesity, social isolation and worsening standards of mental health.

The site's unique circumstances: being largely undeveloped, surrounding an underutilised mainline train station, with limited existing facilities and the need to avoid coalescence with adjacent settlements, positively supports the creation of a new village.

We have carefully considered the importance of a governing philosophy, drawing on Garden City and Model Village principles, together with more recent approaches such as New Urbanism. We advocate drawing influence from all of these philosophies in different ways to create a new community that fully embraces the opportunities and challenges of the 21st century.

The Model Village provides a particularly relevant philosophy, together with creating a legible and relatable vision for stakeholders and the local community. The Model Village is generally perceived as a high quality, healthy and attractive community, typically located within a landscape context, that provided a direct contrast to the urban life of historic industrial Britain. The Model Village also has strong resonance locally, where George Cadbury's Bournville provides an exemplar of community life. As such it creates an ideal precedent to shape a governing philosophy and vision for the site.



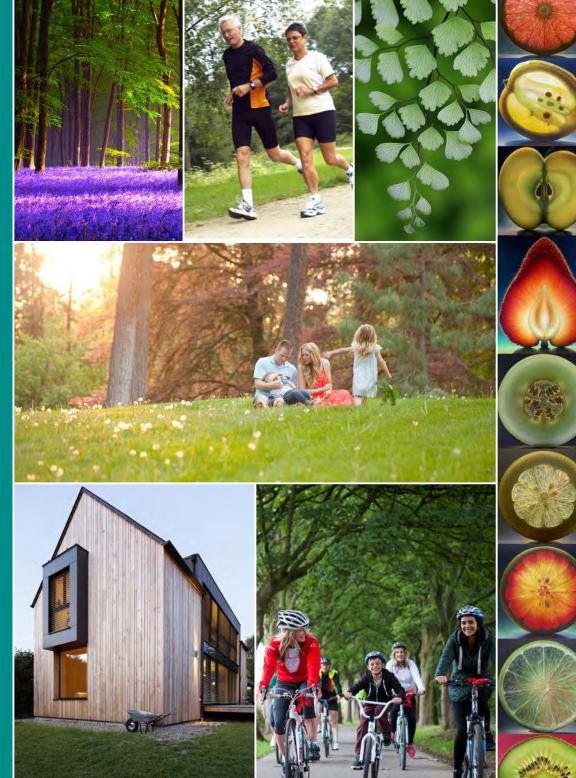
Vision

Rumbush Village will harness its sustainable location around an underutilised railway station and enhance its natural environment to create a unique model village whose diverse range of residents will live happy, healthy and fulfilled lives, within a context of high quality landscape and buildings.

Every resident will have easily walkable access to Earlswood Station, allowing them to live sustainable and stress free lives that minimise their environmental impact and maximise their quality of life.

Residents' lives will be full and characterised by choice: be that spent at home with friends and family, growing food within their gardens or on their allotments, meeting new friends at a community event or exercising at a range of recreational facilities. "...residents will live healthy, happy and fulfilled lives..."











4. Appreciating the context

Contextual analysis

We established a broad study area of land around Earlswood station to review in greater detail to fully understand the context of the site.

The surrounding context is comprised of a series of villages set within the Arden landscape that characterises this part of the West Midlands and Warwickshire.

In order to create a new development that relates sensitively to this context, a range of factors from land use, access and movement, landscape, topography, drainage and heritage have been analysed, together with an understanding gained of the current and future planned development pipeline for the local area. A brief summary is set out adjacent:

Land use

The immediate surrounding context is comprised of a series of modest scale village settlements set in the wider Arden agricultural landscape that characterises this part of the West Midlands and Warwickshire. Larger settlements with a range of mixeduse functions are located in Dickens Heath and Shirley.

Public transport

The site is located immediately adjacent to Earlswood Station, on the Birmingham to Stratford upon Avon railway line: a key benefit to the scheme and a core reason for locating development here. This provides regular, easy and sustainable access to Birmingham and Stratford upon Avon within 25 minutes.

Movement

The site is bisected by Rumbush Lane, with key local routes at Forshaw Heath Lane and Tanners Green Lane providing local connections to nearby destinations. The site is located within close proximity of the M42 and the A435, providing easy access to the strategic movement network by vehicle.

Heritage

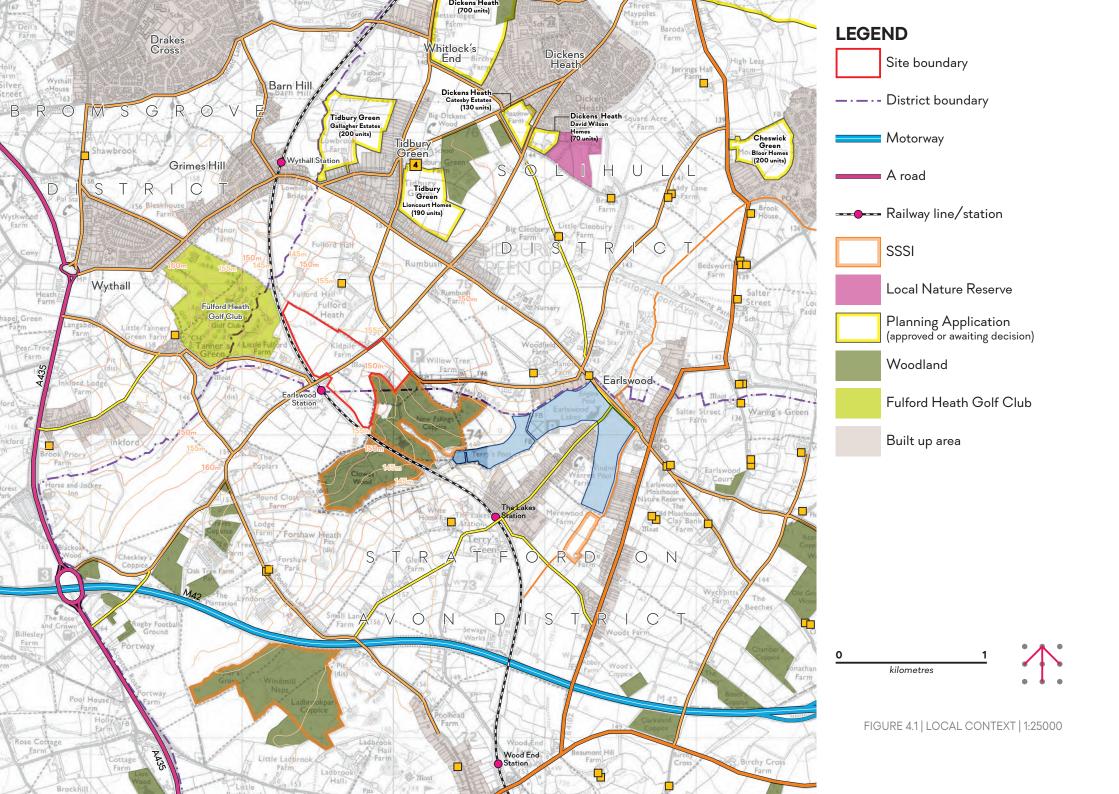
Although the wider Warwickshire context has a rich and significant history, there are relatively few heritage assets in the immediate setting of the site. One exception is Fulford Hall, a grade II listed hall house located to the north of the site, the setting of which requires consideration.

Landscape and topography

The landscape context of the site is varied. In addition to the gently rolling agricultural landscape typified by the site and its neighbouring context to the north, east and south-west, there is an area of SSSI woodland associated with New Fallings and Clowes Wood together with Earlswood Lakes, a group of man made reservoirs that provide a key local recreational asset.

Planning applications

A series of planning applications have been made in the local area, which are at varied stages of the planning process. These are predominantly focussed around Tidbury Green, located some distance to the north of the site.



LEGEND



Listed building

Sensitivity analysis

We undertook a structured and objective sensitivity analysis of the following key issues, the results of which are set out adjacent:

- Topography
- Boundaries
- Landscape scale and quality
- Landscape pattern and complexity
- Settlement or human influences
- Perceptual aspects
- Coalescence
- Recreational value
- Accessibility
- Heritage

Each criterion was assessed as one of the following:

High (red):

Development could have high impact and would require significant mitigation to be acceptable (Red)

Medium (amber):

Development will have a medium impact but through careful design and mitigation would be acceptable (Amber)

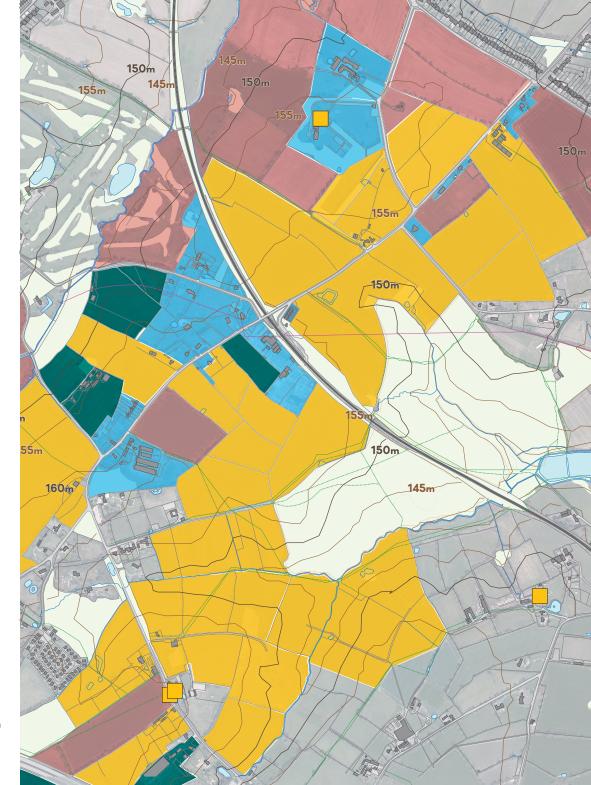
Low (green):

Development will have a low impact and can be accommodated easily (Green)

Existing development (blue):

Land occupied by existing residential development or sensitive landscape uses (recreation space etc) has also been identified.

FIGURE 4.2 | SENSITIVITY | 1:12500



The context

















5. The site

Site overview

The site is formed of land to the north and south of Rumbush Lane. The site is predominantly within the administrative boundary of Solihull MBC, with a small area to the south falling within Stratford DC's administration.

The site is formed of undeveloped agricultural land, largely flat, with dense boundary trees and a number of mature individual trees located within the boundary of the site. An historic moat feature is located within the southern plot.

The western boundary is formed by the Birmingham to Stratford railway line, with Earlswood Station located just off Rumbush Lane. A row of terraced cottages overlook the station's access route and back onto the site. To the north is agricultural land, beyond which is the listed building of Fulford Hall. To the south is a woodland SSSI associated with New Fallings Coppice and Clowes Wood.

Consideration has been given to the following matters, with specialist technical input sought where needed:

- Access, movement and public transport
- Topography, landscape features and ecology
- Landscape and visual impact
- Boundaries and neighbouring uses
- Heritage assets and archaeology

FIGURE 5.1 | THE SITE | 1:6250













Opportunities

- Opportunity to create a high quality, desirable place to live that provides for local and strategic housing needs and will appeal to people of all ages and backgrounds.
- Maximise the opportunity presented by the underutilised railway station at Earlswood, promoting sustainable movement
- Maximise the opportunity presented by the existing wider landscape environment including assets such as Clowes Wood and Earlswood Lakes
- Landscape and ecological resources such as trees and hedgerows within the site form a characterful feature of the land that should be preserved wherever possible.

- The land provides easy and convenient access by vehicle to J3 of the M42 and the wider strategic movement network.
- Importance of establishing optimal points of access into the development and opportunities for through movement within the site to promote movement on foot and by bicycle, particularly into Earlswood station.
- Opportunity to enhance existing public rights of way through the site, allowing the potential to connect to surrounding assets.
- Three pedestrian crossing points over the railway line are located in relatively close proximity, allowing ease of access on foot into the wider environment.

Constraints

- Seek to prevent urban sprawl an potential coalescence.
- Consider recent development which has taken place locally, together with the changing context of the local landscape as a result of planning applications for additional future development.
- Comparative lack of existing local amenities.
- Existing road infrastructure requires improvement.
- Nearby landscape designations including SSSI and nature reserves, together with heritage assets including listed buildings requiring a sensitive response.

- Vehicle access across the railway line is limited, with only one crossing point in the local area.
- The land ownership spans two administrative areas: Stratford District Council and Solihull Metropolitan Borough Council: proposals should show how development could work with and without cross boundary working.
- Topographical change across the landscape will also require careful consideration, particularly with respect to potential for visual impact.





6. Design principles

Key principles

Our guiding vision and analysis has enabled the definition of the following six principles that will shape the development of the masterplan:

Sustainability: delivers a sustainable new community around an existing mainline railway station

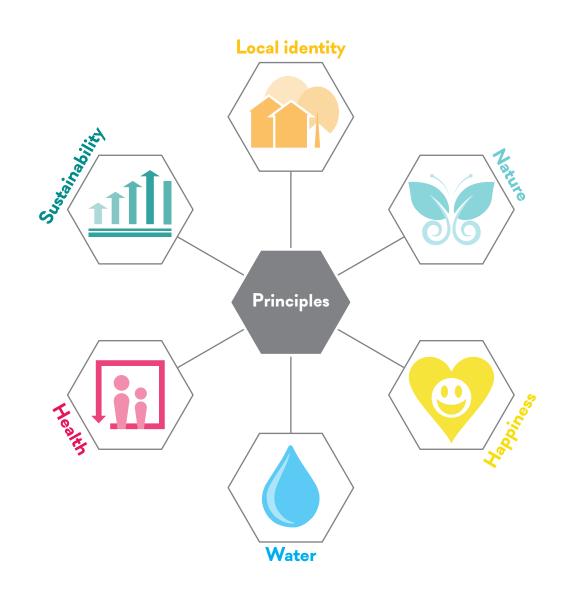
Local identity: possesses a strong and clear identity that relates to its context

Nature: led by landscape and ecology

Happiness: promotes happiness amongst residents

Water: incorporate access to water

Health: promotes health and wellbeing through design





Sustainability

The development will provide a truly sustainable place to live, allowing residents to make green transport choices from walking and cycling to local facilities and leisure assets to using the railway to access employment opportunities. Design features could include:

 The site's inherently sustainable location will be maximised through design, by creating a compact core, placing higher density residential areas closer to a nucleus around Earlswood train station, with lower density development to the site's edges and an extensive landscape and public realm context beyond.

- Sustainable transport, including multi-modal hub around Earlswood station, cycle lanes and facilities, electric vehicles and charging points, car share club, or bike hire scheme.
- Sustainable energy: on site generation, including biomass, solar, wind, ground source or water source pumps.
- Green roofs, walls and permeable paving.
- Sustainable drainage as a key feature of the site, including reflecting local character feature of drainage channels to the sides of streets.
- Investigate potential to incorporate smart technology.

Local identity

We consider that it is essential to create a distinctive identity for the development, which is simultaneously unique and reflective of its context. We have been inspired by George Cadbury's Bournville, which today is a suburb of Birmingham, but when originally conceived, was a new village of similar scale to the proposal.

We have responded to development forms seen within local villages in the Solihull and Warwickshire context, including Tanworth in Arden.

We have also considered the importance of the site's name: Rumbush Village, which roots the development in its existing context, with Rumbush Lane the key route bisecting the site. Rumbush does not exist as a place name anywhere else in the UK, cementing the opportunity for the village to define its own unique character.

The delivery of the scheme should visually reinforce this bespoke identity through materials, details and the creation of a cohesive landscape through signage and wayfinding materials.



Nature

The area's rich landscape and ecological assets are a key opportunity for development, which will:

- Create a green infrastructure framework that allows development to be viewed as buildings within landscape rather than dominating their environment.
- Preserve and enhance landscape character by utilising existing features to help form its 'skeleton', respecting field boundaries, hedgerows, public rights of way, watercourses and bodies and considering impact on key views into, out of and through the area.
- Create nature walks, cycle paths and new bridleways.

- Connect into existing landscape and ecology assets such as New Fallings Coppice, Clowes Wood and Earlswood Lakes, providing a positive recreational activity.
- Actively promote ecology through provision of bird hides, dipping ponds, bat boxes.
- Demonstrate a net gain in biodiversity through the development.
- Increase the coverage of woodland habitat within the site, including active forestry management.
- Plant tree species of local importance to reinforce local distinctiveness.

Happiness

Rumbush Village will enhance the happiness and wellbeing of its residents and the existing population though tackling social isolation. The masterplan will seek to create a benchmark for community design, considering how it provides an environment that enhances the lives of its inhabitants and the existing local population, whilst simultaneously creating an economically viable development proposal.

The development will learn from best practice precedents from the UK and abroad and will respond directly through design to the challenges of 21st century life. This could include:

• Providing access for all, including disabled and older people.

- Providing overlooked, safe, attractive social spaces within the public realm to promote interaction, prevent social isolation and positive mental health.
- Creating a community hub to house groups and social enterprises that focus on community building and provide opportunities for shared workspace to foster community amongst home workers and support new business creation.
- Embracing the potential of the sharing economy including shared working spaces, central delivery hubs and demand led transport.
- Identifying opportunities for varied and innovative housing types: including bungalows, and lifetime homes.



Water

Access to water has powerful and multi-faceted benefits to residential development, from practical benefits such as reducing flood risk to demonstrable enhanced wellbeing, visual amenity, and increased property values. We would seek to:

- Retain existing water features.
- Provide new drainage ponds that will mitigate the potential flood risk created by the development.
- Create swales through open space and along streets, as seen throughout the local Warwickshire countryside, where drainage gulleys run to the side of roads adjacent to a hedgerow, providing a natural run off and opportunity for wildflowers to prosper.

Potential for creation of a new lake to provide a water based recreational asset.

Health

Rumbush Village will enhance the health of its residents and the existing population though promoting exercise and assisting with making healthy food choices. This could include:

- Creation of a range of sustainable movement routes: nature walks, cycle paths and new bridleways, with integrated trail art, interpretation panels and distance markers.
- Location of uses at easily reached locations, maximising available facilities within a 10 minute walk (800m) of housing.
- Creation of a multi-modal (rail, bus, cycle) transportation hub around Earlswood Station to support healthy movement choice.

- Designated space for allotments, community gardens and informal growing corridors. Potential partnership working with community groups, existing garden centre, schools.
- Providing a range of recreation spaces for people of all ages.
- Controlling car parking to ensure that vehicles do not dominate the public realm. In addition to design measures, this could include implementation of controlled maximum parking standards through a residents' permit system or prioritising of electric vehicles.



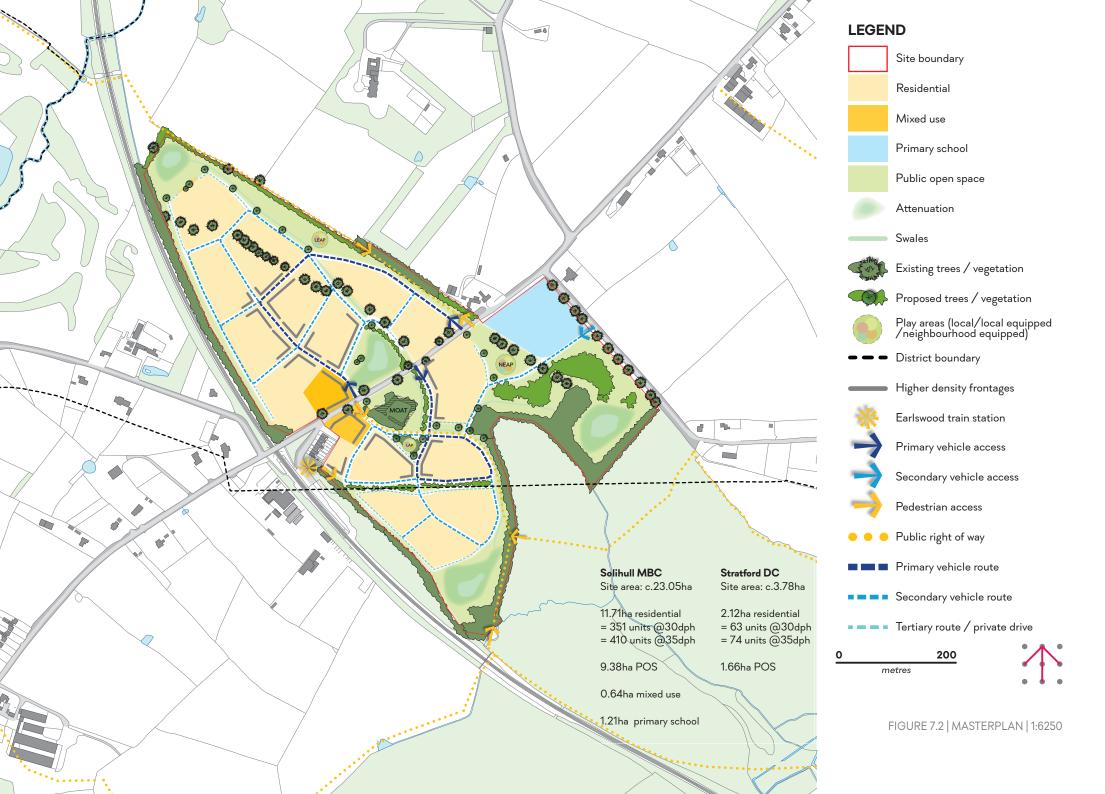
7. Design

Development approach Compact core

Following model village principles, a compact settlement will be created which will provide a nucleated village around the existing train station with a significant green edge to development. This will provide housing of a comparatively higher density to the rest of the development, set in a wider landscape context, to prevent sprawl and the potential for coalescence with existing development.



FIGURE 7.1 | COMPACT CONCEPT IN CONTEXT | NTS



Design overview Use

The development provides the opportunity to deliver a significant number and diverse range of new homes to provide for housing need, in a sustainable and attractive location.

This will include the creation of variety through a series of distinctive character areas, creating safe, healthy and attractive living areas that promote variety and ensure that as wide a community as possible would be attracted to form part of the village.

The scale of development and comparative lack of local facilities lend itself to the provision of a mixed use hub at the development's core, next to Earlswood Station. This could include a primary school, small supermarket, a community centre with shared working space and cafe; a health centre including doctor's surgery and dental practice or older people's housing. This will be located on and near to the existing thoroughfare of Rumbush Lane to enable passing traffic to generate patronage, together with providing for the needs of the community.

Amount

The masterplan provides the potential for the following:

Homes: up to 500 homes

Mixed use: c.0.64ha

School: c.1.21ha

Landscape: c.11.15ha

Layout

The layout has been inspired by model villages and the traditional development forms seen in Warwickshire villages, such as Tanworth-in-Arden, with a central bisected landscape space, allowing the creation of two smaller 'green' spaces, surrounded by development on either side of Rumbush Lane.

Development is designed in perimeter blocks to ensure that public spaces including streets and landscape are activated by development frontages and private spaces are secure to the rear. Generous block sizes allow for the creation of family gardens together with providing the capacity to retain existing trees within rear gardens or on street and provide on plot parking.

Scale and massing

The scale of proposed development is anticipated to be between one and three storeys, allowing the creation of taller focal elements within the core of the village, with bungalows providing lifetime homes options for older and less mobile residents and two storey houses forming the general built scale throughout the site in line with the local context.

The massing of buildings will also vary relative to dwelling type, from terraces in the denser urban core, to semidetached houses in the residential areas and detached properties on the landscape edges, creating a softer edge to the wider landscape, characteristic of traditional villages, minimising the potential for urbanising effect on the surrounding context.



Residential character areas

A range of residential character areas will be provided that create interest and character throughout the village.

Lower density edges

Lower density, softer edges will be provided at the periphery of the site, with a looser structure to the block and building layouts.

Primary school

Opportunity for a primary school to provide for new homes in an accessible location that is also easily reached from existing development

Railway cottages

Rather than turn its back on the railway, the development will provide homes that face onto the line, in the style of Victorian railway cottages, albeit set behind a landscape buffer.

Higher density

Higher density, taller buildings provided along principal connections to define streets and provide variety.

Bungalows

Opportunity for bungalows at boundary with SSSI woodland, providing a sensitive edge and a safe and attractive place for older / less mobile people to live, within close proximity of Earlswood station Village core

Higher density village core, together with the potential for provision of mixed uses close to Earlswood station.

FIGURE 7.3 | MASTERPLAN FEATURES | 1:4167

Landscape

Significant areas of public open space have been designed to accommodate a range of different landscape types. Recreation will be a fundamental feature of the landscape, which will actively promote health and wellbeing, and seek to tackle issues of social isolation and loneliness through creating inclusive environments that encourage people of all ages and abilities to use them.

Recreation areas will include cycling and running routes, together with the potential for an outdoor swimming lake, which could allow Rumbush Village to host events such as triathlons, canoeing or rowing. Opportunities ranging from children's play to equipped fitness spaces should ensure that all members of the community are able to participate. Water is to play a significant role, with drainage ponds and swales providing both essential drainage features and an important ecological contributor.

New woodland, together with nature trails, bird hides, bat and insect boxes and opportunities for bee keeping will ensure that the scheme maximises its ecological potential. The health and wellbeing agenda will be further reinforced through allotments and informal growing routes.

Strategic green connections will be provided with enhanced rights of way allowing cycling and horse-riding through the scheme. These have been located to create buffers to landscape assets such as the nature reserve and SSSI, and also as connections through the development itself.

Access and movement

The site is proposed to be accessed by vehicle at multiple points from the existing highway network of Rumbush Lane and Wood Lane to ensure that it is permeable, allowing through movement into and around the site.

Within the site a structured movement hierarchy will create variety and interest within the streetscene and ensure that movement is safe and legible via a network of connected primary and secondary streets, together with shared surface residential routes.

Appearance and materials

Although the village masterplan is inspired by historic precedents, the architectural design of the scheme need not be pastiche in its approach and instead is proposed to utilise the best of contemporary design influences drawn from the materiality and elements of detail found within the wider setting.



Landscape buffer

A planted buffer will provide a physical and visual break in development, ensuring that a sensitive edge is created to neighbouring land. This will prevent potential for coalescence and will ensure a sensitive relationship with the setting of Fulford Hall.

Movement hierarchy

A stratified movement hierarchy will provide principal routes, secondary routes and shared surfaces, ensuring connectivity, safety and variety

Multiple points of access

Multiple points of access will be provided into both sides of the site, to ensure permeability.

Village green

Creation of contextually sensitive village green at the heart of the development, retaining existing landform and trees and reflecting the character of Warwickshire villages.

Station access

Access on foot into Earlswood station.

Public open space

Attractive and varied area of public open space on edge of development, providing recreation space and drainage features.

Public rights of way

Enhancements to existing public rights of way to improve the quality of surface and legibility of the route.

FIGURE 7.4 | MASTERPLAN FEATURES | 1:4167

Wider potential

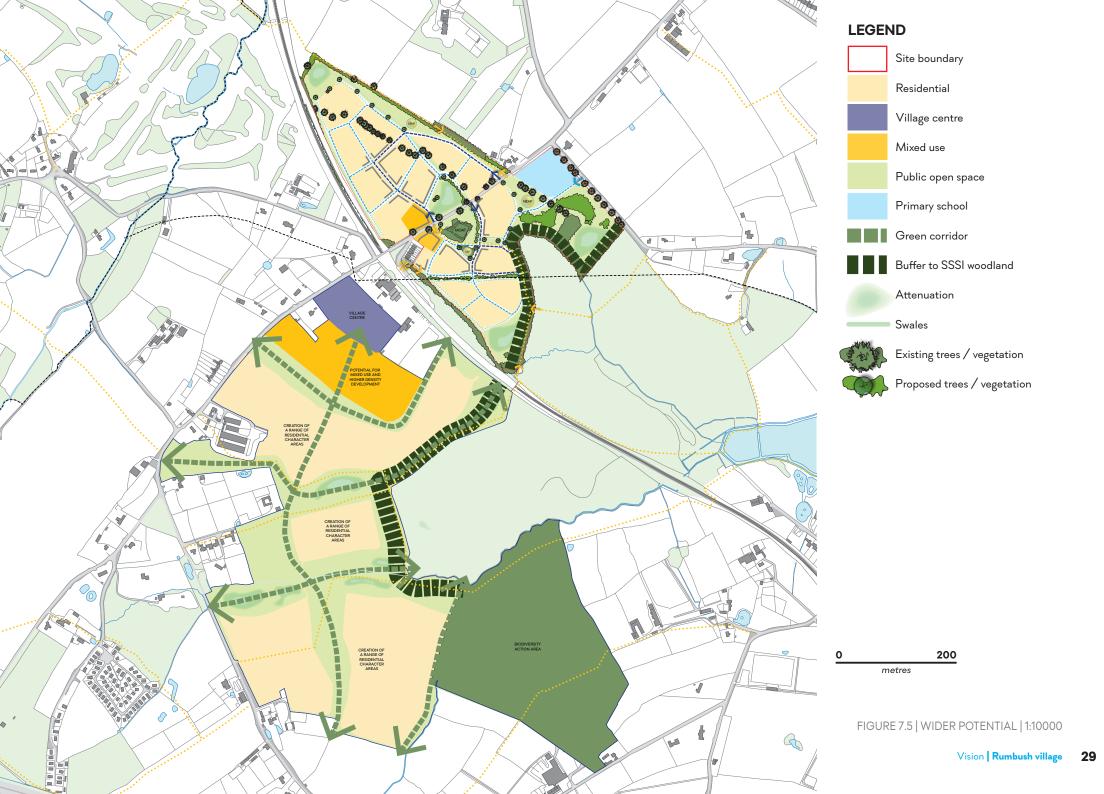
There is potential to expand the scale of the Rumbush Village community beyond the identified boundary in the future, with the inclusion of further land holdings.

A significant area of land to the south-west of the railway line (within Stratford District Council's administrative boundary) has the potential to come forward as a future phase of development that could assist in creating a fully self sufficient, sustainable new community.

We have considered high level masterplan options for how this land could interact with and complement the core proposal for residential development adjacent to Earlswood train station. The plan shown overleaf highlights how additional residential development together with varied mixed use functions could be provided to create a multi-functional new village, creating a sustainable new community, all within walking distance of Earlswood station.

The wider community could incorporate a range of functions and residential types, such as trialling self build, car free, waterfront and cooperative living models.

This additional site area could provide a further 1200 homes, together with supporting uses within a village centre









8. Delivery

IM Land: experts in their field

The site is being promoted by IM Land, who will use expertise and experience to deliver an exceptional place to live. IM Land is one of the UK's leading land promoters, working across a range of sectors and rooted in the Midlands.

IM is one of the UK's largest privately owned property groups, with an investment and development portfolio of circa £900 million across the UK, Europe and the USA. The IM group of companies also includes Spitfire Housing who deliver high quality, award winning residential developments, giving IM a detailed understanding of how to ensure excellence in housing delivery.

Approach

IM are committed to securing high quality, long-term developments through a fair approach to business and the community. By bringing together authorities, housebuilders, occupiers and development partners they facilitate growth and unlock investment opportunities which have the edge over single-promoter schemes. This diverse in house knowledge and experience have ensured that proposals for Rumbush Village reflect current best practice as well as being ultimately deliverable, as demonstrated by flagship schemes including Blythe Valley.

All of the land required for the masterplan is under the control of IM Land, meaning that this site provides a deliverable opportunity to create a high quality, desirable place to live.



Blythe Valley, Solihull

Acquired in 2014 for \pounds 125 million pounds, this site is situated at Junction 4 of the M42, just five minutes from Solihull town centre.

The site is split into two phases, the first of which includes 430,000 sq ft of existing accommodation spread across 11 buildings, with 40 acres of undeveloped land for future commercial development. The second phase extends to 40 acres of development land for residential use.

This is the largest residential allocation in the Solihull Local Plan and the hybrid planning application for up to 750 homes was granted in March 2017.



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