

Solihull Metropolitan Borough Council
via email only

Date: 9 November 2020
Our reference: 1058

Dear Sir or Madam

Representations: Solihull Local Plan Draft Submission Version

Thank you for notifying us of the pre submission consultation on the draft Solihull Local Plan. These representations are submitted on behalf of Orchard Care Ltd (the landowner) and in respect of land at and adjacent to no.79 Earlswood Road, Dorridge. Site plans are attached to Appendices 1, 2 and 3. Having reviewed the Plan, we would be grateful if the following representations are taken into account.

Policy P4E – Meeting Housing Needs – Housing for Older and Disabled People

Policy P4E relates to meeting housing needs for older and disabled people. As currently drafted, the policy does not meet the tests of being positively prepared, justified, effective or in accordance with national policy, as it will fail to meet the housing needs for older and disabled people.

The evidence underpinning the policy is set out in the Housing and Economic Needs Assessment (HEDNA) October 2020 as prepared by GL Hearn. The HEDNA assesses a range of data sources and statistics and makes the following key findings in respect of specific housing targets relevant to this policy:

- A need for around 2,100 housing units with support (sheltered/retirement housing) in both the market and affordable sectors between 2020-2036
- A need for around 470 additional housing units with care (eg. Extra-care), around 30% in the affordable sector
- A need for additional care bedspaces
- A need for around 700 dwellings to be for wheelchair users using technical standard M4(3), in addition to any wheelchair user housing provided within specialist schemes.

Policy P4E makes no reference to any of the above specific targets or even to HEDNA, nor is there any evidence provided to demonstrate the policy will provide a strategy which, as a minimum, will meet the identified needs for specialist older persons housing within the plan period. The plan therefore does not address specific housing requirements in accordance with para.56 of the NPPF.

Draft Policy P4E (4) requires that all developments of 300 or more units must provide specialist housing or care bedspaces in accordance with identified needs. It sets out that this policy will be applied flexibly including site-specific factors, economics, whether it would prejudice other housing objectives, the need to achieve a successful housing development.

It is unclear how the strategy of providing specialist housing for older people on larger residential sites has been selected, justified, or whether is more appropriate than reasonable alternatives such as making specific allocations for specialist housing for older people.

Knight Frank, Land and Planning
Tyndall House, 17 Whiteladies Road, Bristol, BS8 1PB
+44 117 945 8814

knightfrank.co.uk

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Paragraph 9.62 of the HEDNA suggests that developers of extra care schemes can struggle to secure land when competing against mainstream housebuilders or land promoters and that one possible option to alleviate this is to allocate sites specifically for specialist housing for older people. It notes the benefits of this include ensuring sites are in accessible locations, and in doing so releasing larger family housing elsewhere.

The results of an Inquiry by the All-Party Parliamentary Group for Housing and Care for Older People into rural housing for an ageing population are set out in the document titled HAPPI 4 – ‘the Rural Enquiry’ (See [Appendix 4](#)). Amongst other things, this concluded that major housebuilders and speculative developers both want larger sites and have little interest in building outside of their core product range of housing estates comprising two/three/four/five bedroom houses, and thereby do very little to meet needs for the local older populations.

HAPPI 4 recommends that Strategic and Local Plans allocate specific sites for the housing of older people across all tenures, thereby enabling provision that cannot be achieved through open market competition for sites. This would provide additional flexibility in policy that responds to the difficulty these schemes face in competing with conventional, policy compliant sites. This suggestion is required to ensure the plan meets the needs for specialist housing for older people, and would also accord with in the findings of the HEDNA as a more reasonable alternative option.

On this basis, modifications to the plan are suggested in order for it to be made sound. Principally, it should be modified to provide additional site allocations solely to assist with meeting identified housing needs for older and disabled people. This could be achieved through additional settlement-based allocation policies. In doing so, this will ensure the plan is positively prepared, justified, effective and in accordance with national policy.

Proposed Policy Modification

Policy KN3: Land at and adjacent to No.79 Earlswood Road, Dorridge

1. *The site is allocated to provide up to 75* or 160** units of specialist accommodation for older people.*

2. *Development should incorporate the following:*

- i. Vehicular and pedestrian site access from Earlswood Road.*
- ii. Retained/enhanced areas of species rich grassland as part of Local Wildlife Site;*
- iii. Biodiversity off-setting/compensation for any loss of grassland.*
- iv. Retained/enhanced planting and landscaping around site perimeter;*
- v. Existing Public Right of Way running through the site retained;*

3. *Infrastructure requirements should include:*

- i. Provision of suitable pedestrian and vehicular access from Earlswood Road;*
- ii. Appropriate measures to promote and enhance sustainable modes of transport.*

4. *Green Belt enhancements should include:*

- i. Tree and hedgerow planting;*
- ii. Improved landscaping;*
- iii. On site green and blue infrastructure;*
- iv. Access improvements to the green belt beyond the site boundary;*
- v. Biodiversity enhancements;*
- vi. Any other compensatory improvements that considered acceptable.*

* Using land at SHELAA site 210 as per Appendix 2 & 3

** Using land at SHELAA sites 29 and 210 as per Appendix 1

Site Deliverability

National Planning Policy Guidance (NPPG) sets out that when judging the deliverability of a site for plan-making purposes an assessment should be made regarding the suitability, availability and achievability of a development occurring. These factors are addressed in turn below. The site is included within the Local Plan evidence base under site references no's 29 'The Orchard, Earlswood Road' and site 210 'Land between 79 and 39 Earlswood Road'. Part of the site was identified within the Solihull Strategic Housing and Employment Land Availability Assessment (SHLAA 2016 ref. 210) as being appropriate for a 31 unit residential scheme. The site assessment demonstrated that the site has no physical constraints and performs well against the suitability, availability and achievability criteria.

Suitability

The site is part brownfield and part greenfield. Whilst the site is in the Green Belt, the Draft Local Plan Supplementary Consultation: Site Assessments Green Belt Assessment found that the land was a lower performing parcel (RP47) overall with a combined score of 5. This suggests that the site is not essential to the significance of the Green Belt.

The Site Assessment identifies the site as having low/medium accessibility. We consider the site to be in a sustainable location. The site is well served by existing roads. Dorridge primary school is located 1.1 miles from the site. The nearest surgery is located 0.9 miles from the site. The nearest bus stop is situated on the corner of Hansell Drive and Grange Road within walking distance (330m) of the site. This provides high frequency connections to Solihull, Hockley Heath, and Wythall. To add to this, Dorridge Train Station is just 0.8 miles from the site and provides local trains to Warwick, Leamington Spa, the Black Country and Birmingham, and inter city services to London Marylebone.

The Site Assessment states that the development of the site would create an unacceptable incursion into the countryside, create an indefensible Green Belt boundary and set a precedent for the development of surrounding land. The site is essentially an infill plot between existing properties on the southern boundary of Dorridge. Rather than lead to unrestricted sprawl, the development would simply continue the existing line of development along Earlswood Road. As such, the site would be viewed and perceived as part of the linear development along Earlswood Road, and more broadly as part of the outer residential development at the southern edge of Dorridge. The development of the site would not lead to encroachment into countryside. The site is constrained by existing development on three sides which have set permanent and defensible boundaries, whilst new landscaping and planting along the southern site boundary would restrict encroachment and provide an improved buffer.

The Landscape character assessment found that the landscape character sensitivity of the site was medium. The site is largely contained by mature vegetation which restricts views in and out of the site. Existing trees and hedges could be retained and enhanced to create an attractive new landscape setting which would mature and compliment the area in landscape and visual terms. An effective landscaping strategy would keep the views out from the gable ends, as Broadacre Gardens are located to the east. To add to this, groups of trees and a new native hedge could be planted along the southern boundary. This would help to mitigate the visual impact and in turn the openness impact of the development when viewed from the south.

Availability

An outline planning application was recently submitted on part of the site for the erection of a care (use class C2) comprising up to 81 bedrooms. The landowner owns the freehold of the full extent of the site outlined in the attached plan. The landowner fully supports these representations that are submitted on their behalf. There are no legal issues, the site is in single ownership, and is therefore able to come forward for development without delay.

Achievability

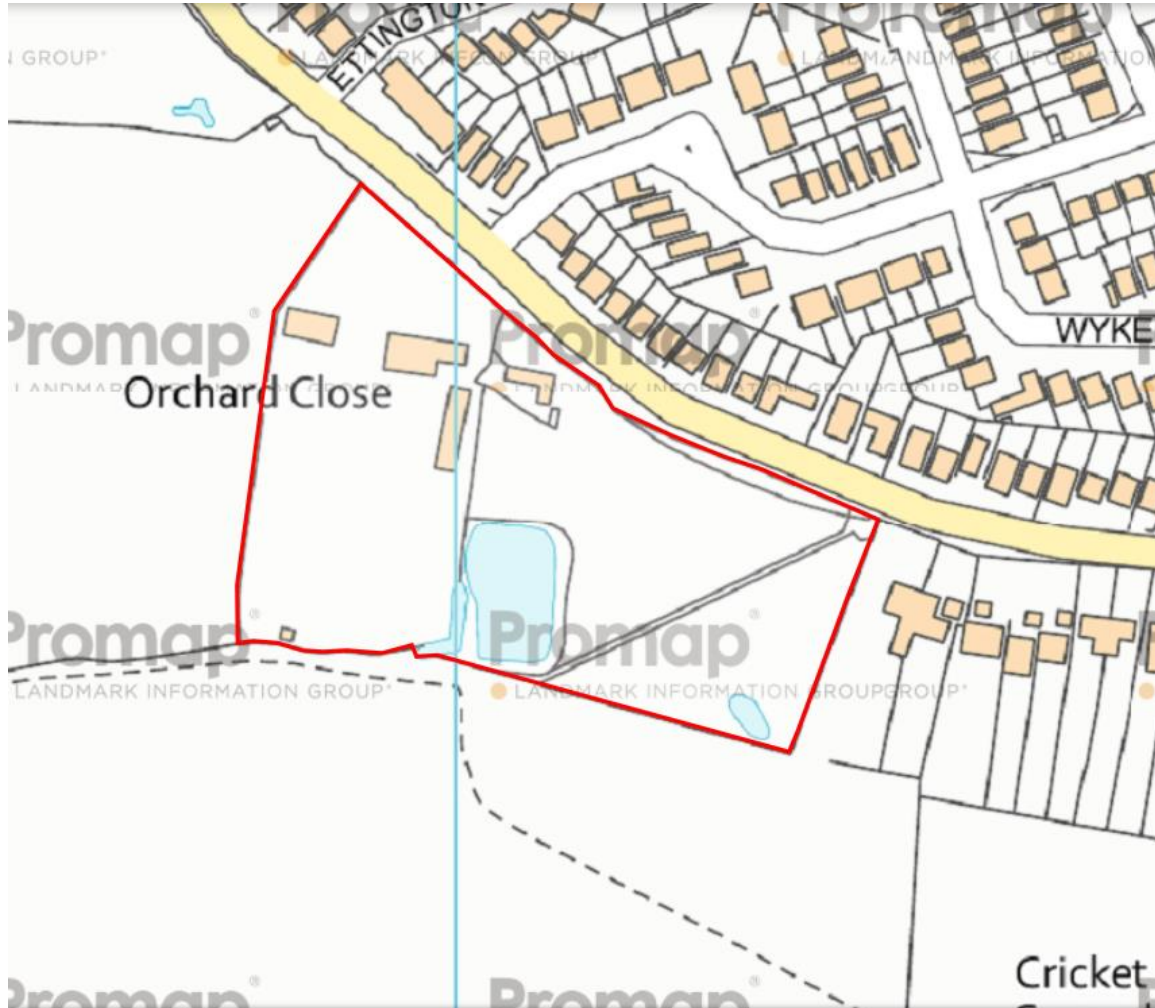
The landowner has already engaged in a formal planning process to achieve a desired consent. There is a strong prospect that the site will become available for development within 0-5 years of the plan period subject to policy and technical constraints being overcome.

We are grateful for the opportunity to make these representations, which we trust will be placed in full before the Local Plan examiner once appointed.

Yours faithfully

George Yates MRTPI
Senior Planner

Appendix 1 – Site Location Plan



Appendix 2 – Earlswood Road, Dorridge Feasibility Plan – 75 units

DEMOLITION OF STABLES

ENTRANCE CAFE BISTRO ETC

BACK OF HOUSE AT GROUND (KITCHEN ETC)
BEDROOMS AT FIRST FLOOR

DELIVERY

TWO STOREY BUILDING
WITH 75NO. BEDROOMS

EXISTING TREES TO BE FELLED

SINGLE STOREY DAYROOM

PROPOSED FILLING OF POND

EXISTING POND

Orchard House

DELIVERY

EXISTING HEDGEROW & TREE PLANTING ON BOUNDARY RETAINED

EARLSWOOD ROAD

ENTRANCE

PROPOSED
75 BED
CARE HOME

5M LANDSCAPE BUFFER

PROW

RETAINED GRASSLAND

no.39









Appendix 3 – Earlswood Road, Dorridge Ecology Plan



crossman
ASSOCIATES



01761 233414
info@crossmanassociates.co.uk
www.crossmanassociates.co.uk

-  Site boundary
-  Suggested developed footprint (retain and enhance hedgerows and trees)
-  Green buffer (recommended minimum)
-  Potential infill of pond
-  Suggested retained and enhanced grassland and pond
-  Biodiversity off-set (0.25ha)

Client Armstrong Burton Architects

Title Ecological constraints

Site Earlswood Road

Figure 1

Date 17 January 2020

Scale Not to scale

Appendix 4 – HAPPI 4 – The Rural Inquiry