

LPR Consultation Policy and Delivery
Solihull MBC
Solihull
B91 3QB

BY EMAIL: psp@solihull.gov.uk

29413/A3/EP/KV/**

14th December 2020

Dear Sir/Madam,

**SOLIHULL METROPOLITAN BOROUGH COUNCIL – LOCAL PLAN REVIEW REGULATION 19
DRAFT SUBMISSION PLAN CONSULTATION**

LAND AT JACOBAN LANE, KNOWLE – IM LAND

We write on behalf of IM Land who are working with landowners in respect of the promotion of land at Jacobean Lane, Knowle (the 'Site'), in connection with the above Solihull Metropolitan Borough Council (SMBC) Regulation 19 draft Submission Plan consultation of the Local Plan Review (LPR). A Site Location Plan is attached at **Appendix 1**.

The Site has previously been submitted to, and assessed by, SMBC (Site Ref. 502, Land off Jacobean Lane). It has been submitted as a site suitable for specialist housing for older people in need of care (over 55's) given the evidenced need as set out in the evidence base, and the below Housing Needs Report (**Appendix 2**).

We accompany our letter with a Vision Document (**Appendix 3**) which contains information about the Site confirming its suitability, availability and deliverability to provide sustainable development which will meet the housing needs of the District, both general and specialist, as well as the wider region. The Vision Document also sets out the particular characteristics of the Site, its constraints, and how these can be mitigated.

It also shows how the landscape and area can be enhanced through good urban design and a strong landscape-led approach. The Vision Document also confirms the feasibility of a footpath from Jacobean Lane to the Warwick Road, and the sustainable transport options available there.

Further to this, we attach an emerging concept masterplan (**Appendix 4**) for the Site which shows how it could come forward as a specialist housing site for older people in need of care. This has been shared with SMBC via a formal Pre-application request to commence discussions relating to an early planning application. This early engagement is further evidence of the Site's deliverability.

Finally, we attach the following technical information:

- Housing Need Technical Note (**Appendix 5**)
- Landscape Advice Note (**Appendix 6**)
- Geoenvironmental Technical Note (**Appendix 7**)
- Arboricultural, Ecological, Heritage and Agricultural Land Classification Technical Note (**Appendix 8**)

We provide detailed responses in respect of the sections/policies of the consultation document below.

Introduction

We consider that the introduction to the LPR should reference the diverse needs of the populations within Paragraph 8 in order to ensure sustainable development.

Further, Paragraph 18 sets out that the site allocations from the Solihull Local Plan (December 2013) will be brought forward. We consider that the re-allocation of these sites which have been allocated for a number of years, without any justification as to their deliverability, is an incorrect approach. We address this in more detail below.

Finally, Paragraph 21 refers to neighbourhood plans and the importance SMBC places on these. Paragraph 30 of the National Planning Policy Framework (NPPF) sets the most recently adopted policies will take precedence. SMBC may wish to set this out within this section, to make it clear that the LPR will take precedence upon adoption.

Soundness – The Plan is not:

- Justified

Change Sought:

- Existing allocations should be tested for deliverability prior to re-allocation
- The hierarchy of neighbourhood plans should be made clear

Challenges

Challenge B

Challenge B relates to meeting housing needs across the Borough, including the Borough's own needs and, where possible, assisting with accommodating the Housing Market Area (HMA) wide shortfall.

As a part of this, the need for a range of affordable housing for older people and for people with learning, physical and sensory disabilities and mental health needs is included.

We consider that this bullet point is split into separate points with the housing needs for older people, including the need for a range of typologies, as a separate bullet point. This is in order to not conflate two separate issues that the plan will have to address. This should be done within both the challenge and objectives of Challenge B.

Challenge E

We consider that Challenge E, which relates to protecting key gaps between urban areas and settlements, should reference meeting other types of development beyond just meeting housing needs.

Challenge J

Finally, Challenge J, which relates to improving health and wellbeing for everyone, should reference the requirement for high quality housing and accommodation require for elderly people within its objectives.

Soundness – The Plan is not:

- Effective

Change Sought:

- Reference to meeting the housing needs of older people should be made more explicit, and not conflated with other issues

Vision

Given the Council Plan (July 2020) specifically sets out that the 65+ age group is the fastest growing section of the Solihull population, and is projected to be so within the next 10 years, we consider that meeting the housing needs of older people should be expressly included within the SMBC's vision.

People aged over 75+ represent more than 15% of the population in 11 of the neighbourhoods which has implications for many services, especially rising demand for health and social care services (p.8). This requirement is confirmed by the SMBC's evidence base.

We also consider that, given Paragraph 59 of the NPPF states that the Government's objective is to significantly boost the supply of housing, the wording relating to meeting the needs of the housing market area should be more positively worded.

Finally, Paragraph 50 sets out that SMBC are seeking to protect the integrity of the Green Belt. Wording should be included setting out that lower performing parcels could be released to protect higher performing parcels while meeting identified and evidenced needs.

Soundness – The Plan is not:

- Positively prepared

Change Sought:

- The vision should reference the need to provide housing for older people in line with the evidence base
- The vision should be more positively worded in order to significantly boost the supply of housing
- The need to release lower performing green belt to meet identified needs, and preserve higher performing parcels, should be set out

Providing Homes for All

Policy P4A Meeting Housing Needs – Affordable Housing

Within the justification for the above policy (Paragraph 172), it states:

“172. The policy applies to all development in the ‘C3’ use class. The policy will also apply to ‘C2’ development that provides individual self-contained units that can be counted as part of the Borough’s overall housing supply.”

This approach is explained within the Meeting Housing Needs Topic Paper (October 2020) and gives further detail as to the rationale behind the approach to affordable housing:

96. Policy P4A will apply to development in the ‘C3’ use class and also ‘C2’ developments that provide self-contained accommodation. If the development is considered unsuitable for on-site affordable housing provision the Council will negotiate a commuted sum so as to meet the need off site. Care developments not providing self-contained accommodation will not trigger an affordable obligation under P4A.

We object to this approach given the lack of clarity, the potential impact this could have on the viability of schemes and the deliverability of this much needed housing, and a lack of need. The requirement for affordable provision for C2 development is held within the justification rather than within the policy.

Further, SMBC have not specifically defined what types of C2 development will require to provide affordable housing (either on-site or off-site). The reference to ‘self-contained units’ is assumed to be taken from MHCLG’s Definitions of General Housing Terms¹. However, this does not allow for any distinction between the types of C2 uses which may be provided as the existence of a front door is arbitrary in some instances to the type of care provided.

This is important given SMBC’s Viability Study (14 October 2020) tests only one C2 typology which is a 30 (one and two bedroom) unit retirement apartment housing scheme. This specifically goes against the advice within the Housing and Economic Development Needs Assessment (HEDNA) (October 2020) which states:

9.61 There are a few implications arising from this. Firstly, there is a need for viability evidence to specifically test and consider what level of affordable housing could be applied to different forms of older persons accommodation, potentially making a distinction between general market housing; retirement living/sheltered housing; and extra care/housing with care. It may well be that a differential and lower affordable housing policy is justified for housing with care. (our emphasis)

The residual development appraisal (Round 1 Appraisal) sets out that, before CIL, an open market scheme of this type would generate a surplus of £551,600 which can deliver approximately 4 off-site² affordable units (13%). When taking into account the additional policy requirements set out within the Round 2 Testing, only 3 affordable housing units could viability be delivered (10%).

What also is not clear within this testing is the level of communal area that has been assumed, and the type of C2 use that is being provided, which can have an impact on the viability of a scheme. It also is not clear if the potential viability issues set out within Paragraphs 9.60 – 9.64 of the HEDNA have been taken into account. This should be clarified, and the level assumed evidenced.

If SMBC continue to seek affordable provision for all self-contained C2 development, the viability evidence should test different scenarios. Given the above testing shows that a viable scheme cannot be delivered (before CIL is even taken into account) it is reasonable to assume that the evidence will

¹ <https://www.gov.uk/guidance/definitions-of-general-housing-terms>

² Assuming the transfer value of an affordable apartment is 50% of open market value.

show that this is not viable. This will then result in the requirement for a costly viability case to be made, which could delay or threaten delivery this much-needed specialist housing.

We also note that the NPPG states that all cost implications, including CIL, and should be taken into account³.

Further to this, the evidence base does not sufficiently interrogate the split in need between affordable and market. This is needed to justify that 40% provision is required. The HEDNA sets out the shortfall/surplus of various specialist housing types by 2036 but only shows the split for some of these types by market/affordable.

It does not, however, set out what percentage of each type of required as affordable provision and this should be rectified with the methodology for creating this split shown. This would allow a full analysis of what the need is, and how much of this need is for affordable typologies.

Notwithstanding the above, for the types it does show this split for (age restricted housing and housing with care), it is noted that affordable need is lower than 40% of the total need. This indicates that requiring a 40% affordable housing obligation would be unjustified.

This point is further evidenced by the enclosed Older People's Housing Need Report (January 2020) (**Appendix 2**) produced by Barton Willmore. This confirms that for certain types, the current supply is biased towards affordable provision:

"B.4.22 The supply of extra care housing in Solihull's biased towards affordable provision. The current tenure split is 33% market and 67% affordable. Older homeowners looking for market (owner occupier) extra care housing are underprovided for, their needs and preference overlooked and the opportunity for them to right size is constrained by a lack of supply.

Finally, we note that NPPG Paragraph 64 confirms that specialist accommodation is exempt from the requirement for 10% of homes (as part of the affordable housing contribution) are to be made available for affordable home ownership. This should be made clear within any policy.

As such, it is clear from the evidence base that the requirement is not justified, or consistent with national policy given Paragraph 34 of the National Planning Policy Framework requires development contributions to not undermine the deliverability of the Plan. Requiring development to provide 40% affordable housing when it is clear from the evidence base that this is not feasible would undermine deliverability.

Soundness – The Plan is not:

- Justified
- Consistent with National Policy

Change Sought:

- Deletion of Paragraph 172 and requirement for certain C2 development to provide for affordable housing.

Policy P4C Meeting Housing Needs – Market Housing

We object to the specific housing mix requirements set out by this policy which is weighted towards smaller (3 bedroom or fewer) houses. This approach does not take into account the length of the

³ Paragraph: 015 Reference ID: 63-015-20190626 and Paragraph: 001 Reference ID: 10-001-20190509

Plan Period and that market requirements may change over this period. Further, the specific requirement does not accord with Paragraph 62 of the NPPF which seeks to create mixed and balanced communities.

As such, we consider that a more pragmatic and flexible approach is taken, utilising latest market evidence. This is the approach taking for other matters within this policy, and should be extended to the mix.

Soundness – The Plan is not:

- Justified
- Effective

Change Sought:

- Amendment of policy to allow for housing mix based on up to date market evidence

Policy P4D Meeting Housing Needs – Self and Custom Housebuilding

The latest Annual Monitoring Report (March 2020), covering the period 2018/19, sets out that the for the period November 2018 – October 2019 there were 374 entries on the Self-build register.

As such, requiring all sites of over 100 houses to provide 5% of open market dwellings in the form of self-build plots is unreasonable and unjustified. Given provision is being made for 7,605 houses through allocations above 100 houses and the UK Central Hub area, this would equate to the 760.5 self and custom build plots to be provided from the draft allocations.

This is far in excess of the need shown and therefore the Council should consider providing specific site/allocations to meet this need, in line with Paragraph 61 of the NPPF. This is an approach taken by other Councils, such as Lichfield District Council or Stratford-on-Avon District Council.

Further, we consider that the provision of such plots on strategic-size housing sites is likely not what those on the register are seeking. This may mean they are left empty for the required period which could delay the delivery of much needed housing.

We therefore consider that this policy should be deleted, and SMBC should either allocate specific provision of this need, or offer general support for this type of housing but not set specific thresholds.

Soundness – The Plan is not:

- Justified
- Consistent with national policy

Change Sought:

- Deletion of specific policy requirement and replacement with specific allocations or general support for self-build sites

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

Policy P4E seeks to provide specialist housing for older and disabled people. This is in response to an evidenced need. The HEDNA sets out that there will be a shortfall of 3,215 units⁴ by 2036. Taking into account the schemes in the pipeline, this shortfall is lowered to 2,804 units.

The HEDNA therefore suggests:

9.62 Secondly, developers of extra care schemes can struggle to secure land when competing against mainstream housebuilders or strategic land promoters. One way of dealing with this is to allocate sites specifically for specialist older persons housing, and this may be something that the Councils wish to consider through the preparation of new Local Plans. There could be benefits of doing this through achieving relatively high-density development of land at accessible locations, and in doing so, releasing larger family housing elsewhere as residents move out. (our emphasis)

In addition to this, the key points from the Older Peoples' Housing Need Report (October 2020) (**Appendix 2**) produced by Barton Willmore are:

- **We find an immediate requirement in Solihull for 1,622 units of specialist housing for older people. In addition, over the period from 2020 to 2036 there is a further requirement for 1,495 units of all types and tenure.**
- In total there is a requirement for 3,117 units of specialist older persons housing **with the greatest need in both sheltered housing and extra care housing schemes.**
- The Council's Housing and Economic Development Needs Assessment (HEDNA, 2020) recognises that specialist housing for older people should be provided for and calculates that there is a need for 2,179 units by 2036.
- We find this to be a **significant underestimate**, principally because in response to indicators of need and demand it assumes provision rates (specialist housing units per capita) that are too low.
- For that reason, the Barton Willmore assessment should be preferred. The following tables provide a summary of the need for older persons housing by two key categories – housing without care (including age restricted and sheltered housing), and housing with care (including enhanced sheltered and extra care housing).

Summary of Total Need (by tenure and type) – Solihull Borough

Type (Units)	Rental	Leasehold	Total
Without Care	-126	2,207	2,081
With Care	462	574	1,036
Total (by Tenure)	336	2,781	3,117

Source: EAC Q4 2020, Housing in Later Life 2012

- It is apparent that there is an existing oversupply (relative to recognised prevalence rates) of social rented sheltered (age exclusive) accommodation, whilst **across all types of accommodation 58% falls within an affordable tenure, leaving only 42% of units in the open market.** Given the existing tenure profile of older residents of the Borough it is clear that existing choice of provision is heavily biased towards those in tenures other than home ownership, with limited options for those seeking units on the open market.

⁴ Age restricted housing, housing with support, housing with care, residential care bedspaces and nursing care bedspaces

- There is a particular need for housing with care in the Borough, particularly extra care (which provides registered care), and eclipses the demand for enhanced sheltered (providing unregistered care).
- There is a clear immediate requirement for specialist older people's housing within Solihull and given the local demography and the critical need recognised by Central Government, greater emphasis should be placed on increasing the supply of specialist housing that suits older people's needs and preferences.
- In all respects, Solihull exhibits the characteristics of the national housing crisis, albeit the symptoms (such as worsening affordability and house price inflation) are more severe than the regional and national trends. This requires a range of measures to be put in place - not just more housing but a strategy that addresses the needs of different groups; e.g. affordable housing, family housing and housing for older people.
- A strategy that addresses the housing needs of older people will support planned increases to historically low rates of housing delivery by increasing a sales rate in Solihull that remains below pre-recession rates, lagging the regional and national benchmarks. **Moreover, in addition to meeting the needs of older people and their preference to be owner occupiers, the development of housing for sale that addresses the needs and demands of older people provides the added benefit of freeing up family housing.**
- In Solihull, under occupancy rates for householders aged over 65 are significant and evidenced by the fact that according to 2011 Census data, 87% of over 65 households are under-occupied, the majority of which are owner occupied households. **Moreover, 83% of householders aged over 65 whose day to day activities are limited a lot under occupy, implying a significant need for suitable specialist accommodation, were such accommodation available.**
- By providing housing more suitable to this age group that addresses its needs and preferences (for leasehold accommodation in particular), the family homes that they presently under occupy will become available to the market, in addition to new build family homes, thereby **addressing the significant need for family housing that the Solihull Local Plan seeks to address.**

In order to meet this need, Policy P4e seeks to require all developments of over 300 houses to provide specialist housing or care bedspaces in accordance with the SMBC's most up to date statement of need on older person's accommodation. The policy then states that it will be applied flexibly taking into account:

- Site specific factors which may make step-free access unviable;
- The economics of provision, including particular costs that may threaten the viability of the site;
- Whether the provision of housing at these standards would prejudice the realisation of other planning objectives that need to be given priority in the development of the site;
- The need to achieve a successful housing development.

As such, in order to provide for the evidenced need, it is reasonable to assume that SMBC are expecting the larger schemes to provide for the above need. The below table sets out the supply within the LPR that is above the 300-house threshold:

Reference	Site Name	Site Area (Ha)	Capacity	Delivery Period ⁵	Masterplan showing specialist housing?
Draft Local Plan Allocations (inc. UK Central Hub)					
BC1	Barratt's Farm	91	875	II and III	N
BL1	West of Dickens Heath	23	350	I and II	N
BL2	South of Dog Kennel Lane	47	1,000	I, II and III	N
BL3	Whitlocks End Farm	14	300	I and II	N
KN2	South of Knowle	49	600	I and II	N
SO1	East of Solihull	43	700	I and II	N
	UK Central Hub Area	140	2,740	TBC ⁶	N
Additional Supply					
Sites Identified in land availability assessments			320	TBC	
Town Centre Sites			961	TBC	
Solihull Local Plan (2013) allocations without planning permission			350	TBC	
Windfall Housing Land Supply			2,800	TBC	
Total			10,996		

The above shows all of houses within the Council's supply which could fall within the threshold and be required to provide specialist housing. However, we consider a number need to be removed:

Site	Amount to be removed	Reason for removal
UK Central Hub Area	2,740	<p>The emerging Arden Cross Masterplan does not make any reference to specialist housing. As such, we consider this should be removed.</p> <p>We also note that there is no reference to providing specialist housing within the specific section on the UK Central Hub Area in the LPR.</p> <p>Finally, notwithstanding the above, as set out below, we consider that a large number of this will not be delivered during the plan period.</p>

⁵ Indicative delivery period: I = years 0-5, II = years 5-10 & III = years 10 -16

⁶ Taking into account the Council's commentary relating to the complexity of the UK Central Hub proposals and the enabling works required, we anticipate this will come forward towards the end of the plan period. We provide more commentary on this below.

Sites identified in availability assessments	320	As set out below in more detail, we consider that this is double counted and is included within the windfall supply.
Town Centre Sites	254	<p>100 of these houses are attributed within the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2020), to Chemsley Wood Town Centre and, as such, would not meet the threshold.</p> <p>861 houses are attributed within the SHELAA to Solihull Town Centre, but it does not set out the split between of sites within the town centre. However, the Solihull Town Centre Masterplan (December 2016) sets out several different areas that could come forward. Whilst it is noted that the amount of housing proposed to come forward within the Masterplan (1,216) is higher than the LPR (861), only 707 of these would come forward in schemes that may meet the Council's threshold.</p> <p>We also note there is no reference to providing specialist housing with the specific section relating to Solihull Town Centre in the LPR.</p>
Solihull Local Plan (2013) allocations without planning permission	350	As set out within the SHELAA, none of the three remaining sites are above the threshold. Further, as set out in more detail below, we consider these should be deleted from the housing supply as there is no evidence to show their deliverability.
Windfall Housing Land Supply	2,800	Given the Council's monitoring shows that windfall supply since 1992 has averages 209dpa, it is reasonable to assume there will be no sites that come forward above the 300 dwelling threshold.
Total	6,464	

This therefore leaves allocations totalling 4,532 homes that might be required to provide an element of specialist housing by virtue of Policy P4e. This does not take into account the concerns relating to specific allocations which may not delivery housing within the Plan Period (or early within the Plan Period), which is set out in more detail below. This may further reduce the amount of specialist housing that can be delivered through this mechanism. And even then, because of the policy's "flexible" application, it does not actually guarantee deliver of *any* specialist housing for older people.

Further to this, SMBC have released Draft Concept Masterplans (October 2020) for the emerging allocations within the LPR. None of these make provision for specialist housing. Given the Policy allows for a policy compliant scheme to come forward without providing any specialist housing (i.e. through the provisions on its "flexible" application), this points towards there being a lack of provision amongst these sites as they come forward.

As such, the policy does not set out what provision is required, but if these sites were required to provide 10% specialist housing, this would total just 453.2 homes which does not come anywhere

close to meeting the evidenced need, even on the Council's figures. As such, and taking into account that the policy can be complied with without providing any specialist housing, the Council's proposed mechanism will not meet the identified need (3,117 as identified by the Barton Willmore Report).

It should be reconceptualised, and specific allocations made to meet this identified need.

The Policy also seeks to provide for specialist housing for both older and disabled people. This conflates the two different and specific needs. The requirement for M4(2) or M4(3) housing does not provide specialist housing for older people as it will not create the types of housing needed as set out by the HEDNA. Further it is noted that these additional requirements are not seen as viable within the Council's viability testing. As such, if this requirement is to be retained for specialist housing, it should be evidenced that it will not impact upon viability/deliverability. Wording should also be included setting out it may not be required/feasible in certain instances⁷.

The Policy also requires provision of specialist accommodation in line with the SMBC's most up to date statement of need. This does not appear to be available, so we would question how the policy complies with Paragraph 34 of the NPPF in showing what contributions will be expected. It is also not clear how the need will be split per site. Given the above viability point, this cannot be relegated to an updated Meeting Housing Needs Supplementary Planning Document (SPD).

The rate of delivery also needs to be considered. The HEDNA sets out that the majority of the shortfall is needed by 2026. Further the Older Peoples' Housing Need Report (October 2020) sets out that there is an immediate need for 1,622 units of specialist housing.

SMBC's stepped trajectory assumes the majority of housing will be delivered during Phases II and II of the Plan Period (2026-2036). As such, there is a risk with the current mechanism that any specialist housing delivered will not come forward in line with when the need occurs.

As such, we consider that the current approach will not meet the evidenced need in the correct timeframe, and therefore is not positively prepared, justified, effective, or consistent with national policy⁸. Further, SMBC have not sufficiently tested the mechanism with regards to viability or set out what is expected by the policy sufficiently.

It should therefore be reconceptualised and specific allocations made to meet the evidenced specialised need, both immediate and longer term. We also consider SMBC should reassess their evidence given the higher need evidenced in the Barton Willmore Report.

The Site at Jacobean Lane is well placed to provide for this need, and the technical information shows it can be delivered early in the Plan Period.

Soundness – The Plan is not:

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

Change Sought:

⁷ Paragraph: 008 Reference ID: 56-008-20160519

⁸ Given the how far away the proposed is from meeting the evidenced need, we consider that even if further sites are allocated to meet an increased housing requirement, the current approach would still likely not meet the evidenced need for specialised housing.

- Reconceptualisation of Policy P4e and the allocation of specific sites (including the Site at Jacobean Lane) to meet the evidenced specialised need

Policy P5 Provision of Land for Housing

Policy P5 sets out the Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing supply to deliver 15,017 additional homes in the plan period. This would result in an average annual housing land provision target of 938 net additional homes per year. This annualised target is made up of a stepped requirement with 851 homes per year delivered between 2020-2026 and 991 dwellings delivered between 2026-2036.

Demand

A Housing Need Technical Note has been provided (December 2020) (**Appendix 5**) and should be read in conjunction with our commentary on Policy P5. In summary, this Note makes the following key points:

- Planning Practice Guidance (PPG) states the Standard Method (SM) figure represents the **minimum** housing need, and there may be circumstances whereby need is higher;
- The Draft Plan identifies the clear economic growth aspirations for the Borough, including the nationally significant growth planned for at the UK Central Hub. This is a circumstance where housing need may exceed the minimum need. If it does, housing delivery must be of a quantum to support these aspirations;
- The Council's 2020 HEDNA confirms that the calculation of housing need is underpinned by the growth at the UK Central Hub. The Hub is projected to generate an additional 13,000 jobs to the baseline Experian job growth forecast (10,000 jobs) included in the HEDNA;
- The HEDNA tests several economic-led housing need scenarios. However, the UK Hub Scenario assumes **only 25%** of the additional 13,000 jobs created by the Hub are to be taken up by Solihull residents. This results in the housing need (**816 dpa**) underpinning the Plan;
- However, this ignores the 'Growth A' scenario which concludes that **908 dpa** would be required based on the 'Adjusted Local Growth' scenario. This scenario assumes that strong industries in Solihull will outperform the baseline Experian forecast, resulting in an additional 5,680 jobs to the baseline (10,000 jobs) over the Plan period, with Solihull residents taking up these jobs;
- However, no scenario is presented to show what the housing need would be based on the UK Central Hub scenario being fulfilled in full by Solihull residents. It is important to understand this so that the duty to cooperate discussions referred to in the HEDNA are well informed;
- Barton Willmore provide these sensitivity scenarios based on two approaches to commuting, and two approaches to underlying demographic rates (mortality, fertility, and migration);
- The results of our testing are summarised in Table 7.1:

Table 7.1: Solihull Borough – Barton Willmore Demographic Forecasting 2020-2036

Scenario	Demographic rates	Jobs per annum	Dwellings per annum
		2020-2036	2020-2036

Dwelling-constrained:	2016 ONS rates	772 ¹ – 813 ²	807
Standard Method	2018 ONS rates	1,014 ¹ – 1,068 ²	
Employment-constrained:	2016 ONS rates	1,437	1,199 ¹ – 1,248 ²
UK Central Hub	2018 ONS rates		1,036 ¹ – 1,085 ²

Source: Barton Willmore Development Economics

¹ Commuting Ratio 0.98

² Commuting Ratio 0.93

- Growth of **between 1,036 and 1,248 dpa** would be required to support the UK Central Hub scenario (between 16,576 and 19,968 dwellings in total);
- This represents an increase of between 220 dpa and 432 dpa on the housing need calculated by the HEDNA (816 dpa), or **an additional 3,520 to 6,912 dwellings** over the Plan period;
- Our analysis of historic levels of job growth in Solihull 1991-2019 shows a range of 1,225 and 1,650 jobs per annum (jpa). This highlights that the UK Central Hub scenario (1,437 jpa) is a realistic assumption;
- The HEDNA identifies an 'acute' situation in respect of affordable housing need. Our analysis suggests that the HEDNA's conclusion on overall need (816 dpa) should be increased to meet as much affordable need as possible.
- Furthermore, our analysis of unmet need in the wider GBBCHMA suggests that the 2020 Position Statement's conclusions under-estimate the remaining unmet housing need from Birmingham up to 2031, and for Birmingham alone the deficit in unmet need is **between 11,294 and 13,101 dwellings up to 2031**;
- In addition, there is significant unmet need up to 2031 based on the existing Standard Method coming from Birmingham City and the Black Country. This amounts to unmet need of between **25,543 and 27,350 dwellings up to 2031**. If we were to assume the increased capacity for Birmingham City (65,400 dwellings 2011-2031) set out in the 2020 Position Statement the unmet need would still be **between 11,243 and 13,050 dwellings up to 2031**. This increases significantly based on the uncapped Standard Method figure for Birmingham City which would come into effect once Birmingham's Local Plan becomes older than 5 years in 14 months time;
- Adoption of the proposed changes to Standard Method consulted on by Government in summer 2020 would lead to there being unmet need against emerging/existing housing requirements in **all but one** of the GBBCHMA authorities;
- Furthermore, the unmet need **post 2031** should be considered, as referenced to in the 2020 Position Statement. Based on data available at the present time and the most recent Local Plan figures, Barton Willmore calculate this to be a minimum **17,700 dwellings 2031-2040**.
- In summary, the analysis in this report results in the following broad conclusions:
 - 1. The SM's minimum need for Solihull (807 dpa) will need to be increased to account for expected job growth from the UK Central Hub and the 'acute' need for affordable housing in the Borough;**

2. **Barton Willmore's demographic modelling shows that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario;**
3. **Barton Willmore's calculations suggest that the deficit in unmet housing need from Birmingham City being delivered by HMA Local Plans amounts to a minimum of between 11,294 and 13,101 dwellings up to 2031, a significant increase from the 2,597 dwellings concluded on by the 2020 Position Statement. This increases when the unmet need from the Black Country is considered. Additional unmet need will be created post 2031.**

As such, in order to ensure the LPR is positively prepared, SMBC should seek to plan for more housing, and should allocate further sites.

Supply

Further to the above, and as set out above, we also consider that some elements of the supply should be reviewed:

Sites in Land Availability Assessments

There is no reference to what these sites are or where they have been assessed. Given it is likely they are seen as 'available' we consider they should be classed as windfall development and should therefore be removed to avoid double counting.

Brownfield Land Register

We consider that the sites held within the Brownfield Land Register should be included within the windfall allowance, given this is how they will come forward. Further, a Brownfield Land Register should be updated at least once a year⁹ and, as such, a fixed amount should not be included within the supply calculations.

Solihull Local Plan (2013) Allocations

Whilst we note that the SHELAA confirms that pre-application discussions are taking place for one of the existing allocations (Site 3 – 175 homes), these sites have been delivered despite being allocated since the current Local Plan was adopted. Given the Council cannot demonstrate a 5 year housing land supply, it stands to reason that all deliverable sites should have been encouraged to come forward.

As such, we question whether these sites should be included within the supply calculations.

Allocated Sites

We have commented on specific sites within the settlement chapters but, in summary we consider the SMBC should review the delivery rates and capacity of certain allocations.

Windfall Supply

The windfall allowance is calculated based on past windfall within Solihull. However, SMBC have sought to include other sources of supply which would have been included within these past calculations (town centre sites and brownfield land). As such, this represents an element of double counting and should be recalculated.

⁹ Paragraph: 025 Reference ID: 59-025-20170728

UK Central Hub

We consider that given the scale of the UK Central Hub proposals, the rate of delivery assumed by the Council is overly optimistic. The Council have not provided any trajectory for the Site, and we note that the August 2020 consultation did not contain any firm commitments to delivery timescales or set out any delivery partners.

This assertion is supposed by the findings of the Lichfields' Report¹⁰ that sets out the average time from outline planning application to the first delivery of homes is 8.4 years. The average build out rate is 160dpa.

As such, taking this into account, and based on a LPR adoption date of 2022¹¹, we consider the first completions will likely be C.2030. With an average build out rate of 160dpa, this means that approximately 960 dwellings will be delivered during the Plan Period, assuming that the housing is within the first delivery phases (the August 2020 consultation referenced a mix of uses coming forward). While more outlets may increase the speed of delivery, the amount of infrastructure required also needs to be taken into account. The type of supply also needs to be considered, with UK Central Hub likely to be geared towards apartments.

As such, we consider that 1,780 houses should be removed to take into account the likely delivery timescales.

Lapse Rate

We note that the 10% lapse rate applied does not take into account windfall, the UK Central Hub Area or allocated sites. We consider that a 10% lapse rate is suitable, but that it should be applied to future development as well.

Trajectory

We also note that SMBC are seeking to provide a stepped trajectory as some of the larger sites will not make a significant contribution to completions until the mid-delivery phase. The Inspector assessing the Guildford Local Plan set out:

39. In the submitted plan, the combined effect of the stepped trajectory in Policy S2 together with the "Liverpool" methodology (in which the delivery shortfall accumulated over the first 4 years of the plan (2015/16 to 2018/19) is spread over the whole plan period), would have deferred a significant proportion of the housing requirement to the later years of the plan. Set against the (then higher) housing requirement, this would not have met the Government's objective to boost the supply of housing in the shorter term. (our emphasis)

We consider that SMBC should take the same approach as Guildford and allocate further sites to meet need early in the Plan Period. The existence of the UK Central Hub is not of a sufficient size to warrant a different approach (i.e. it is not akin to a new settlement).

Further, as with the withdrawn Uttlesford Local Plan this stepped trajectory may create a fragile 5 year housing land supply position, taking into account the ambitious delivery targets of the UK Central Hub and the delivery concerns relating to the draft allocations set out below. The Inspectors' letter relating to the withdrawn plan states:

¹⁰ Start to Finish 2nd Edition (February 2020)

¹¹ Whilst the Local Development Scheme (January 2020) states adoption in spring/summer 2021, the programme is currently running C.6 months behind

29. This calculation relies on the use of a reduced annual requirement of 568 dpa for most of the years, as it is based on the stepped trajectory set out in Policy SP3. It is also based on what we consider to be unrealistic commencement/housing delivery dates for two of the Garden Communities (North Uttlesford and Easton Park, as set out above). So, whilst the Council can, in theory, demonstrate a 5.65 year HLS, we are concerned that if the housing delivery at North Uttlesford and Easton Park slips by just one year, as seems very likely, this would result in 100 less dwellings in this 5 year period. This would result in a very fragile 5 year HLS position.

There are comparisons that can be drawn here based on the stepped trajectory and the anticipated 5.37 year supply upon adoption.

The Inspectors for the withdrawn Uttlesford Local Plan also referenced the need to meet the full objectively assessed need for market and affordable housing in the housing market area (NPPF Paragraph 47). The HEDNA states there is a 'clearly acute' shortage of affordable housing. The proposed stepped trajectory therefore may worsen the affordability problem as it would delay the provision of housing until late years of the plan period.

Taking the above into account, we consider that the SMBC's supply is actually 11,496 (rounded) before any reduction in windfall or the deletion of draft allocations which are unlikely to be delivered is taken into account.

This is a reduction of 3,521 and, as such, to meet the increased demand set out above, and take into account the concerns relating to a stepped trajectory, a review of the supply is required and additional sites allocated.

The Council should also ensure that a large number of these sites can be delivered early on in the Plan Period in order to take account of the likely later delivery of some other sites.

Soundness – The Plan is not:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

Change Sought:

- Review of demand and amendment to the strategy
- Review of supply and amendment to the strategy
- Allocation of additional sites to ensure housing need is met (including suitable provision for wider HMA needs) and an annualised trajectory is possible

Improving Accessibility and Encouraging Sustainable Travel

Policy P7 Accessibility and Ease of Access

We consider that the requirement for major residential development should be clarified to set out that there may be other ways in which sustainable access options can be implemented. The distance to a bus stop/train station should not be seen as the only measure of sustainable access.

Soundness – The Plan is not:

- Positively prepared

Change Sought:

- Policy should be clarified that there are other ways of ensuring sustainable transport options are available

Policy P8 Managing Travel Demand and Reducing Congestion

Paragraph 109 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within point 2(ii), SMBC are seeking to bring in a further test which would not be in accordance with the NPPF. This should therefore be deleted.

Soundness – The Plan is not:

- Consistent with national policy

Change Sought:

- Point 2(ii) should be deleted

Protecting and Enhancing our Environment

Policy P11 Water and Flood Risk Management

With regards to point 6, the confirmation of discharge into a public sewer falls under Section 106 of the Water Industry Act 1991. As such, it should be made clear that planning permission can be granted prior to this being confirmed, as it falls within a different regulatory regime.

With regards to point 14, it should be clarified that contribution through a Section 106 Agreement is only required where it meets the tests set out in NPPF Paragraph 56.

Soundness – The Plan is not:

- Justified
- Consistent with National Policy

Change Sought:

- Deletion of point relating to confirmation from relevant infrastructure owner
- Clarification as to obligation requirements and the necessary tests

Promoting Quality of Place

Policy P17 Countryside and Green Belt

Within Point 1 of the policy, SMBC is seeking to safeguard best and most versatile agricultural land (BMVAL) unless there is an overriding need for development that outweighs the loss. BMVAL is referenced within the NPPF at Paragraph 170 which states that planning policies should contribute to and enhance the natural and local environment by taking into account a number of criteria. One of these is:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the

economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Firstly, we consider that including reference to BMVAL within a policy relating to Green Belt seeks to conflate two separate issues. Further, as can be seen above, the test set out by the NPPF does not require the safeguarding of BMVAL. Planning policies are required to contribute to and enhance natural and local environment by recognising economic and other benefits from BMVAL. As such, we consider this point should be deleted.

SMBC have set out, within Point 4, a number of different factors that may be taken into account when considering very special circumstances. We consider that a further factor based around providing for a clearly evidenced need should be included. For specialised housing for older people, this factor was taken into account in two recent appeals¹².

Further to this, point 5 sets out that development that is 'conspicuous' from the Green Belt must not harm the visual amenity of the Green Belt by reason of siting, materials or design. Given Green Belt is a spatial designation, designed to prevent sprawl, we consider that this requirement goes beyond the scope of the Green Belt, as set out in the NPPF. The LPR contains policies relating to protecting landscape, where necessary, and as such, this point should be deleted.

Soundness – The Plan is not:

- Positively prepared
- Consistent with National Policy

Change Sought:

- Deletion of point 1
- Inclusion of further factors which may create very special circumstances
- Deletion of point 5

Policy P17A Green Belt Compensation

Paragraph 138 of the NPPF sets out that 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.

Policy P17 is seeking to require this by requiring development on sites removed from the Green Belt to provide appropriate compensatory improvements to environmental quality and accessibility of remaining Green Belt in the form of a Section 106 Agreement utilising the below hierarchy:

1. Compensatory requirements as set out as part of the Local Plan masterplans
2. Where no compensation has been set out within the Local Plan masterplan, improvements are provided as:
 - i. Improvements within the Green Belt adjacent to, or in close proximity to, the development site;
 - ii. Improvements within the Green Belt adjacent to, or in close proximity to, the settlement or area accommodating the development;
 - iii. Improvements within the Green Belt in an area identified for environmental improvements as part of the Council's Green Infrastructure Opportunity Mapping.
3. In the event it is robustly demonstrated that none of the above options can be satisfied then the Council will accept a commuted sum.

¹² APPQ/4625/W/19/3237026 and APPH/2265/W/18/3202040

Given none of the emerging masterplans show any compensatory improvements within the Green Belt, it would appear that the Policy is relying on there being additional land being available within the control of applicants (which may not be the case), or the payment of contributions.

SMBC's viability evidence does not take this requirement into account, and no detail is provided as to how these contributions will be spent or what level of contribution is required. This therefore brings uncertainty, and the Policy should be reconsidered to ensure what is required is clear, and that it will not impact upon the viability of schemes.

Soundness – The Plan is not:

- Consistent with National Policy

Change Sought:

- Reconsideration of the policy to ensure that it is evidenced based, does not impact upon viability of schemes, and is in accordance with national policy

Health and Supporting Local Communities

Policy P20 Provision for Open Space, Children's Play, Sport, Recreation and Leisure

Point 8 of this policy states that the Council will seek to secure well-designed new and improved open space and their maintenance as an integral part of new residential (including care homes), commercial (over 1ha or 1,000sqm) or mixed use development.

It is not clear if this requirement is for public or private open space. Further, it is noted that while open space provision has been included within the viability testing for residential sites this is not the case for care homes where the Section 106 buffer only includes biodiversity net gain and primary care contributions.

As such, given specialist housing for older people serves a specific need, and there is a requirement set out within point 12, the requirement for care homes to provide for open space should be deleted. Further, given the users of specialist housing for older people would have limited need for some types of open space, if this is retained, it should be clarified what provision is required.

Soundness – The Plan is not:

- Justified
- Consistent with National Policy

Change Sought:

- Deletion of point 8 (in relation to care homes)

Delivery and Monitoring

Policy P21 Developer Contributions and Infrastructure Provision

Policy P21 expected major development to provide or contribute towards the provision of measures to directly mitigate its impact and physical, social, green and digital infrastructure.

SMBC's viability testing does not take into account digital infrastructure within the testing and, as such, it should be evidenced that this will not render development (especially specialist housing for older people) unviable.

Soundness – The Plan is not:

- Justified
- Consistent with National Policy

Change Sought:

- Confirmation that digital infrastructure provision allows for viable development

Settlement Chapters**Policy BC1 Barratt's Farm, Balsall Common**

Barratt's Farm is scheduled to deliver 875 homes in years 6-15 of the Plan Period (2026-2031). This delivery is required to provide, among other things, the majority of the proposed bypass as the first phase of development that will form the main vehicular access point (with the funding for the rest coming from CIL and potential grant funding), a new 2 form primary school and enhanced parking for the railway station. Paragraph 543 also states that much of the development will not come forward until later in the Plan Period, given the likely disturbance that HS2 will cause in the area.

Paragraph 541 also sets out that the Site has 'multiple and potential complex land assembly issues'. This was also set out within the Supplementary Consultation, and it would therefore appear there has been little progress in relation to land ownership issues.

As such, we are concerned that the infrastructure requirements, and land assembly issues, mean that there is a danger the Site will not be delivered within the required period. Given the relief road will be funded by CIL payments, which are only collected after a scheme has been commenced (or later for larger schemes), there seems to be no clear plan how this will be delivered early in the programme.

Given the size of the allocation, this also places doubt as to the trajectory of the entire Plan (taking into account the concerns raised above in relation to the stepped trajectory).

Further, the Interim Sustainability Appraisal notes the lack of employment within the village, which will increase the need to travel to employment. This raises questions as to the suitability of the settlement to provide for 31% of all proposed allocations.

SMBC should therefore clearly set out what reasonably can be delivered by this Site, and other sites within Balsall Heath, taking into account the infrastructure requirements, and how they will be funded. If it transpires that the amounts currently scheduled to be delivered within the Plan Period are unachievable, SMBC should investigate whether further sites in other locations are required to meet the identified need within the correct periods.

Policy BL1 – West of Dickens Heath

This Site proposes the redevelopment of the existing sports pitches associated with Highgate Football Club, Leafield FC and the Old Yardleians Rugby Club. The current land use also contains a Local Wildlife Site and designated Ancient Woodland as well as historic hedgerows.

As such, SMBC should ensure their assessments are fair, robust and objective and the site is sequentially acceptable when weighed against others.

It is also noted that future work is required in connection with replacement of the displaced pitches (Paragraphs 594 and 605). This has not moved forward since the previous consultation in March 2019.

SMBC should ensure that Paragraph 97 of the Revised NPPF (2019) is adhered to and replacement pitches of equivalent or better quality in a suitable location are shown. This should be shown to be feasible before the Site is allocated for development. Another option would be to reduce the capacity of the Site in order to retain the pitches.

Soundness – The Plan is not:

- Justified
- Effective
- Consistent with National Policy

Change Sought:

- Reprovision of the sports pitches should be secured prior to allocation

Policy HA2 Oak Farm, Catherine-de-Barnes

It is noted that the policy states that this may be suitable for specialist housing for older people, and has been subject to a recently dismissed appeal for such uses. However, given the Site is allocated for unrestricted housing, and is below the 300 home threshold of Policy P4e, there is no guaranteed this will include any specialist provision and this should not be relied upon.

Policy KN1 Hampton Road, Knowle

As with the Site West of Dickens Heath, this draft allocation requires the reprovision of sports pitches. In this instance, the re-provided pitches are currently shown within the Green Belt to the north of the allocation.

The Council, within Paragraphs 713-715 state that it's likely that very special circumstances will exist to support development in this location and, as such, the reprovision will likely be acceptable. However, this pre-judges any application, for which the detail is not know, and as such cannot be relied upon. Therefore the housing that would be provided on the sports pitches should not be included until the reprovision of the sports pitches is secured.

Soundness – The Plan is not:

- Justified
- Effective
- Consistent with National Policy

Change Sought:

- Reprovision of the sports pitches should be secured prior to allocation

Site Selection

SMBC has assessed the Site (Ref 502) against its site selection process. As part of this within Step 1, SMBC have classed the Site s 9 (Greenfield in isolated lower/moderately performing Green Belt location). As set out in our previous consultation response, we consider that the Site should be scored as a priority 5, and should therefore move through to Step 2 of the assessment.

While SMBC's Green Belt Assessment (2016) gives the Site an overall score of 7, this is made up of a wider parcel (Refined Parcel 36:7). However, the assessment within the Barton Willmore Landscape Advice Note (**Appendix 6**), which assesses the Site only, confirms that there is limited contribution to purposes 1-4 and no contribution to purpose 5. As such, the overall Green Belt score for the Site should be 4.

With regards to accessibility, the Site Selection process (October 2020) states at footnote 5 that an accessible location is located either (our emphasis) on the edge of an urban area, or on the edge of a settlement that has a range of services including a primary school and range of retail facilities.

It is then confirmed that a broad approach to accessibility is used based on a site's location and a finer grain of accessibility is used at Step 2. As such, it is considered the assessment at Step 1 should focus on the location of the development in accordance with footnote 5. Geographically, the Site immediately adjoins the northern edge of Knowle and Copt Heath which has been confirmed as a sustainable location (and is a focus of Growth Option F).

The surrounding Sites that have been assessed as part of the Site Hierarchy have mainly been scored a Priority 6 within Step 1 and, as such, have passed through to Step 2. There do, however, appear to be inconsistencies with how the Council have assessed Sites within Step 1. The Council should ensure that an objective and uniform analysis is undertaken.

As such, and in accordance with footnote 5, we would consider that the Site is within an accessible location. Notwithstanding this, given the Site would be allocated for specialist purposes, SMBC should make allowance for this within the selection process. The proximity to a school, for example, would not be a requirement in this instance. SMBC therefore may wish to consider amending the site selection process for specialist provision.

Given the above, we consider that the Site falls into Priority 5 (potential allocation). As such, the Site would move on to Step 2 (Refined Criteria) for a more detailed review. On this basis, we review the Site against Step 2 below. We note that Step 2 has no scoring or weighting attributed and is a qualitative process.

FACTORS IN FAVOUR
<p>In accordance with the spatial strategy (Including only proportional additions to lower order settlements (i.e. those without secondary school or not located close to urban edge.)</p> <p>The proposed development would accord with the spatial strategy considering it is located on the edge of a settlement with a range of services (as confirmed by footnote 18 of the consultation document).</p> <p>We also note that SMBC's assessment of the Site is flawed given it places the Site within Category 3 based on potential for contaminated land. The evidence held at Appendix 7 shows this would not be the case, and would mean the Site falls within Category 1 (see below for assessment). As such, it can therefore be concluded that the Site would be in accordance with the spatial strategy.</p>
<p>Any hard constraints only affect a small proportion of the site and/or can be mitigated.</p> <p>As set out in the Vision Document held in Appendix 3, the Site does not contain any hard constraints (as set out in the SHELAA Assessment) that cannot be mitigated. The Vision Document, and concept masterplan (Appendix 4) show how the Site could come forward through a high-quality landscape-led approach.</p>
<p>Site would not breach a strong defensible boundary to the Green Belt.</p>

The Site enjoys strong defensible boundaries to the north in the form of the M42, to the east in the form of the existing canal and to the west in the form of Jacobean Lane and the sport pitch provision beyond. These physical, engineered, features would prevent sprawl extending north or east. More information on this is held within the Landscape Advice Note held in **Appendix 6**.

Any identified wider planning gain over and above what would normally be expected.

The Site would deliver much needed specialist housing for which there is an identified need.

Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.

See above.

If finer grain accessibility analysis shows the site (or the part to be included) is accessible.

The Step 2 assessment refers directly to the Accessibility Study. This focuses on the various facilities/services and their proximity to the Site. The Accessibility Study gives a total score of 40 which puts the Site as 'least accessible'.

However, we consider there are flaws within the Accessibility Study:

- There is no consideration given to travel by bike (noting the good cycle link from the Site to the centre of Knowle);
- There is no consideration given to the ability to upgrade infrastructure (as set out, a footpath linking the Site to the A4141 is feasible);
- The Study focuses on too few services and does not take into account those services adjacent to the Site (Old Silhillians Hockey Club and Copt Heath Golf Club); and
- The Study does not take into account the specialist nature of the proposed and make allowances for this.

The above shows that the accessibility of the Site should be judged by more than the Accessibility Study and other factors should be taken into account. This includes the proposed specialist use of the Site. For example, proximity to a school would not be of importance.

FACTORS AGAINST

Not in accordance with the spatial strategy.

See above.

Overriding hard constraints that cannot be mitigated.

There are no hard constraints identified. The technical note held at **Appendix 8** shows there are not constraints relating to arboriculture, ecology or heritage which cannot be overcome.

SHELAA category 3 sites unless demonstrated that concerns can be overcome.

The Site should be categorised as Category 1, as shown below. Further, the reason for the Category 3 score is because of perceived contaminated land issue. We consider this could be overcome.

Site would breach a strong defensible boundary to the Green Belt.

As already confirmed, and as set out in the Landscape Advice Note (**Appendix 6**), the Site would utilise existing defensible boundaries and proposed to strengthen where required.

Sites that would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.

The Site would create a strong defensible boundary.

If finer grain accessibility analysis shows the site (or the part to be included) is not accessible.

See above.

If the site is in a landscape character area that has a very low landscape capacity rating.

The Site is situated within Landscape Character Area (LCA) 1: Solihull Fringe and in sub area 1B. This landscape is described as being influence by the direct proximity of the urban edge to the open countryside and sits wholly within the Birmingham Green Belt. The landscape of LCA 1 is described as having a medium character sensitivity and medium landscape value.

Sub character area 1B is described as comprising a variety of land uses and vegetation cover including farmland (pastoral and arable), transport corridors - M42, secondary roads and the Chiltern Railway line, residential ribbon development, parkland, woodland (some of which is ancient) and golf courses. The sensitivity of the landscape character is assessed as medium and the landscape value medium.

The Site also adjoins the northern edge of LCA 3: Knowle and Dorridge Fringe, which is described as being largely rural with scattered blocks of woodland across the area with signs of urban influence towards the northern extent of the LCA. The landscape management guidance follows that of LCA 1.

The landscape capacity for this area is Low and, as such, the Site passes this test. It is also noted that the Landscape Advice Note (**Appendix 6**) summarises that the Site has a contained Zone of Visual Influence.

If the SA appraisal identifies significant harmful impacts.

The SA has assessed the Site and has identified 1 major significant impact (SA19). This is factually incorrect, however, as the distance to a local convenience store is given as 1927m but to be a significant effect it must be further than 3km away. Therefore, the Site would be in accordance with this factor.

Notwithstanding that, as set out above, we consider that the assessment should take into account the specialist nature of the proposed, and that certain services are not as important.

In summary, the Site passes the Step 1 assessment given it falls within Priority 5. As such, it passes to the Step 2 assessment which utilises a professional judgement of the Site against a list of factors. Having assessed each of those factors, it can be seen that the Site is considered appropriate for inclusion as a green site and should be taken forward by the Council given its location and specific circumstances.

Further, we have also provided an analysis of the SHELAA, using the same assessment and scoring criteria. The Site does not contain any Absolute Constraints and the assessment should be amended based on the evidence submitted within this submission.

Suitability Criteria	SMBC Score	Score	Comment
Suitability of Location for Development	3	3	Adjacent to Knowle
Site Access Score	5	5	Existing road access is adequate but may require upgrade to meet full sustainability aims
Bad Neighbour Constraints	3	5	No bad neighbours
Ground Conditions Constraints	0	5	The submitted evidence shows the Site has a low chance of contamination
Contaminated Land/Historic Landfill Site	0	5	
Flood Risk Constraints	5	5	Flood Zone 1
High Pressure Gas Pipeline	5	5	No pipeline identified
Biodiversity	5	5	Site does not within, or adjacent to, Local Wildlife Site (noting the potential Site)
Heritage	4	4	Adjacent to listed building
BMV Agricultural Land	3	3	Site is Grade 3 Agricultural Land
Suitability Score	33/50 (1 ¹³)	43 / 50 (3)	Results in a 'suitability' score of 3 i.e. the site is suitable and could contribute to the five-year supply
Availability Criteria			
Availability Details	3	3	Site is under option to a promoter
Achievability Criteria			
Achievability Details	2	3	Good marketability and / or viability. Site faces few achievability constraints and is likely to be achievable within 5 years. The concept masterplan shows that the proximity to the M42 will be addressed.
Total	Category 3	Category 1	

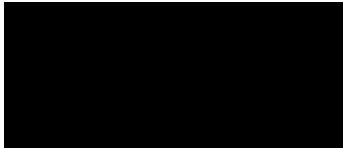
¹³ The SHELAA Methodology states that any Site that receives a 0 against certain criteria (including contaminated land) can only score an overall suitability score of 1.

Conclusions

We welcome the Council's decision to hold a further consultation for the Local Plan Review and the opportunity to comment on the site selection process. The Site at Jacobean Lane has previously been submitted to the Council and will be included within subsequent Local Plan Review documents. However, as can be seen above, we have assessed the Site against the Council's criteria and feel the Site should be included as an allocation given its highly sustainable location and lack of constraints. There is the opportunity to provide high quality development to meet the Borough, and wider region's housing needs.

We trust that you will take these comments as helpful in progressing the Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,



KATHRYN VENTHAM

Partner

Cc. Sarah Milward – IM Land

Encs.