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Our Ref 180VAV00

14 December 2020

Dear Mr Palmer,

**SOLIHULL LOCAL PLAN DRAFT SUBMISSION PLAN OCTOBER 2020 REGULATION 19
CONSULTATION - REPRESENTATION IN SUPPORT OF SITE SO2 MOAT LANE DEPOT**

Cushman and Wakefield (C&W) are appointed by Solihull Metropolitan Borough Council (SMBC) Strategic Land and Property (acting in the Council's capacity as landowner) to submit representation in support of the allocation of Site SO2 Moat Lane Depot for residential development as part of the Solihull Local Plan Draft Submission Plan (October 2020).

This representation is supported by a RIBA Stage 1 Concept Design Document prepared by Building Design Studio, which develops the project brief, related feasibility studies and concept design. Analysis provided within the Stage 1 Report has informed the Preferred Concept Masterplan (ref. 18036-BDS-XX-XX-PP-A-0001-S2_P01.01).

The Plan-Making Process and Policy Context

Regulation 19 consultation measures the Draft Submission Plan against the prescribed tests of soundness defined by the National Planning Policy Framework (2019), and these form the basis of this representation:

- 1) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is consistent with achieving sustainable development;
- 2) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 3) Effective – deliverable over the plan period; and
- 4) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

We consider the residential allocation of Site SO2 Moat Lane Depot within the Local Plan Draft Submission (October 2020) to be sound – positively prepared, justified, effective and consistent with national policy. Site SO2 forms an important and entirely appropriate allocation which will contribute materially to the Local Planning Authority's housing land supply, and which will support a conclusion that the Plan is sound.

We fully support the residential allocation of this site for development of at least 90 new homes. The site will make an important contribution towards the objectively assessed housing need and requirement for 15,017 additional homes across the Plan period.

The site is exceptionally well located, close to the town centre, and will support new housing in a location that is accessible and consistent with achieving sustainable development. It is deliverable within Phases III of the Plan period (10-16 years) as per the Allocated Sites Summary Table at paragraph 226, and in accordance with the NPPF Annex 2 Glossary definition and PPG (paras 007 Ref ID: 68-007-20190722, and 019 Ref ID: 68-019-20190722).

On this basis, the proposed allocation of Site SO2 Moat Lane is appropriate and in accordance with the strategic objectives of the Draft Submission Plan and NPPF paras 136 and 137. We request, however, that Policy SO2 Moat Lane (and the Summary Table at para 226) and the Concept Masterplan Document, refer to the site's capacity being 'at least' 90 dwellings (to allow for flexibility at the outline planning application stage) which the Preferred Concept Masterplan and Stage 1 Report confirm is achievable.

Meeting Housing Needs and Site SO2 Moat Lane Depot

The Draft Submission Plan sets out several challenges to be addressed. Challenge B refers to meeting housing needs across the Borough, '*including the Borough's own needs and, where possible, assisting with accommodating the HMA wide shortfall*', and a key objective to ensure that the full objectively assessed housing need for the Borough is met for the plan period, consistent with the achievement of sustainable development and the other objectives of the Plan.

We agree with this objective.

Draft Policy P5 Provision of Land for Housing states '*the Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036*'. Paragraph 226 includes a summary table of residential allocations. Site SO2 Moat Lane Depot is included as a 3-ha site with capacity for at least 90 new homes to be delivered during Phase III (10-16 years).

Draft Policy SO2 Moat Lane Depot proposes allocation of the site for 90 dwellings, and development broadly consistent with the principles of the Concept Masterplan, including:

- Provision of 0.7ha public open space including doorstep and local play facilities.
- An integrated drainage, landscape and ecological strategy should be developed for the site, which seeks to remedy the drainage issues on the site as an opportunity to enhance place-making

Draft Policy SO2 Moat Lane Depot refers to the Concept Masterplan document and that although there may be change in light of further work at the planning application stage, significant departure from the principles outlined for Site SO1 should be justified.

We agree with the need to allocate sufficient land to meet local housing need, and the proposed allocation of Site SO2 Moat Lane Depot to contribute at least 90 homes towards this target.

Paragraph 237 confirms '*it is important that efficient use is made of the land available to ensure delivery of sufficient new homes in the Plan period.*' Paragraph 240 recognises dwelling figures for the Allocated

Housing Sites have been informed by concept masterplans, but that the eventual capacity will depend on detailed design and layout which may mean totals fall outside the indicative range. The Indicative Density table following suggests density of 30 - 40 dph within 'significant extension of urban or larger village edge' areas, such as Site SO2 Moat Lane Depot and apartments as appropriate.

The Preferred Concept Masterplan submitted demonstrates that the site could deliver over 100 new homes in line with the requirements of Policy P5 and other policies within the Draft Submission Plan.

The site is capable of being delivered within Phase III (10-16 years) subject to the relocation of the existing Council Depot use. Allocation of the site will ensure a supply of housing is available throughout the plan period, especially in the later years (Challenge B, page 13).

Site SO2 Moat Lane Depot is an appropriate site and will provide new housing land consistent with the aim of the Plan to achieve sustainable development (Challenge B objectives, page 14). The site will provide a range of house types to widen the local housing offer and ensure a range of market and affordable housing is delivered (Challenge B, page 13), including an opportunity for self-build (draft Policy P4D) and accessible house types for older and disabled people (draft Policy P4E).

Site UK2 Damson Parkway

Separate representations are also submitted by SMBC Strategic Land and Property to support the proposed relocation of the existing Council Depot to a combined site with a new Household Waste Recycle Centre (HWRC) at Site UK2 Damson Parkway.

The existing Council Depot site is owned and operated by SMBC. SMBC operates the existing Household Waste Recycling Centre (HWRC) at Coventry Road, Bickenhill via a third-party strategic environmental contractor. The two sites are operationally related but are currently situated approximately 3.5 miles apart. Both sites are constrained, which limits existing and future operational efficiencies.

A new Council Depot facility at Site UK2 Damson Parkway will ensure the council can meet its obligation to provide Strategic Environmental Services, including street care, forestry and highway maintenance. Site UK2 has been identified in response to operational, space and locational requirements and provides opportunity for an efficient combined facility including the HWRC.

SMBC Concept Masterplan Document (October 2020)

The Concept Masterplan submitted with the Draft Submission Plan includes the following Site Analysis of Site SO2 Moat Lane Depot:

The 3 ha urban site is located north of Solihull town centre. The 2016 Draft Local Plan anticipated that the site had a capacity of 150 new dwellings.

The site is bounded by Lode Lane to the West, which has the rear boundaries of existing dwellings, commercial and community uses which front Load Lane. Moat Lane to the south, and the Wharf Lane development to the north and east of the site provide a largely residential context to the site. Development up to 4 storeys in the locality is not uncommon.

Current site land uses include, industrial, commercial uses and the SMBC Moat Lane depot. Many of these are still in operation and have existing lease agreements in place. The potential land contamination on site is unknown at this stage, however the risk of surface level flooding is known and will need to be addressed.

Development must also have regard to potential flood risk areas.

The Illustrative Concept Plan makes the following reference:

A central area of Public Open Space seeks to provide opportunities to promote footpath links to the neighbouring Wharf Lane development to help integrate the two developments. Based on 90 homes the development will need to provide 0.7ha of Open Space. The development will require a Doorstep Play Space.

New green infrastructure in the form of avenue tree planting, is promoted in order to maximise pedestrian links through and beyond the site. The site should utilise opportunities to maximise green/blue infrastructure and include linear conveyance SuDS in green routes and optimise layouts to ensure extreme flood flow paths are not impeded.

Medium to high density development is appropriate in this residential location. Development along Moat Lane and Lode Lane should reflect an understanding of the prevailing character. Within the site higher density development may be appropriate this approach reflects that of the neighbouring development where higher density development is at the centre of the development. The layout promotes perimeter block development to maximise natural surveillance and encourage active streets.

An integrated drainage, landscape and ecological strategy should be developed for the site, which seeks to use the drainage issues on the site as an opportunity to enhance place-making on site.

The removal/ relocation of telecommunications mast should be explored.

We agree with the capacity of the site to deliver at least 90 new dwellings to contribute towards local housing need. The Preferred Concept Masterplan prepared by BDS (ref. 18036-BDS-XX-XX-PP-A-0001-S2_P01.01) illustrates how at least 90 dwellings could be accommodated on the site and therefore Policy SO1 should be amended to refer to delivery of 'at least 90 dwellings' to ensure most efficient use of land. We agree the proposed density of 30-40+ dph is appropriate and consistent with national and local planning policy.

Preferred Concept Masterplan Development and Phasing

A Preferred Concept Masterplan is submitted with this representation to show how the site could be developed to provide at least 90 new homes. This is informed by detailed technical assessment and on-site surveys. The submitted masterplan confirms the proposed allocation is positively prepared, justified, effective and consistent with national and local policy.

The site is located 1.5 km north of Solihull Town Centre, and is well connected to Solihull and the wider region. Access to the site is currently provided off Moat Lane, linked to the B425, which provides access to the town centre. Solihull train station is approximately 2.5 km south west of the site.

Current land uses include light industrial and commercial uses and the SMBC Council Depot. The site is predominantly surrounded by residential development, with light industrial employment uses to the north.

The site achieves a positive score against most objectives set out in Sustainability Appraisal (Aecom, 2020) submitted with the Draft Submission Plan. The assessment recognises proximity to the town centre, frequent bus and train services and proximity to the principal road network for employment sites and local primary and secondary education. The site does not include any local wildlife sites or ecologically sensitive areas.

Concept Design and Preferred Concept Masterplan (Building Design Studio, December 2020)

Consideration of the full extent of the opportunity that the site presents to achieve sustainable and high-quality development has been informed by the site and context assessment prepared by SMBC to support the Local Plan process and consideration of environmental and technical assessments commissioned.

Planning Policy Framework

Draft Policy P5 Provision of Land for Housing allocates land for *at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036*, including Site SO2 Moat Lane Depot with capacity for at least 90 new homes to be delivered during Phase III (10-16 years).

The draft policy framework is relevant to development of the masterplan, including the following:

- Draft Policy P5 – Provision of Land for Housing confirms the appropriate density will be informed by the need to maximise the efficient use of land, the appropriate mix of housing, local character and distinctiveness and the scale, type and location of development.
- Draft Policy P4A Meeting Housing Needs – Affordable Housing requires the provision of 40% affordable housing on sites of 10 units or more.
- Draft Policy P4C – Meeting Housing Needs - Market Housing requires a mix of market dwellings having regard to local need, with 30% 1 or 2 bedrooms, 50% 3 bedrooms and 20% 4 or more bedrooms.
- Policy P4D – Meeting Housing Needs - Self and Custom Housebuilding requires a contribution of 5% of open market dwellings on allocated sites of 100 or more as Self and Custom Build Plots.
- Draft Policy P4E Meeting Housing Needs – Housing for Older and Disabled People requires all developments of 300 dwellings or more to provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older person's accommodation.
- Draft Policy P20 Provision for Open Space, Children's Play, Sport, Recreation and Leisure requires new housing developments to provide or contribute towards new open spaces or the improvement of existing provision in the area, in line with the minimum standard of 3.57 ha per 1,000 population.

- Policy SO2 Moat Land Depot allocated the site for 90 new dwellings.
- The Open Space Assessment (2019, Ethos Environmental Planning) submitted with the Draft Submission Plan requires sites of more than 200 homes to provide the required open space on site.

Preferred Concept Masterplan (Building Design Studio)

The Preferred Concept Masterplan submitted shows how 131 new homes and public open space could be delivered, consistent with national, local and emerging planning policy. The site is a sustainable location with good local and regional access and strong links to Solihull Town Centre.

The site provides a development density of 35-40+ dph.

Primary access is provided from Moat Lane, with clear connections and improved pedestrian and cycle connectivity through the site. Public Open Space is provided. The proposed density of development reflects the character of the local area. Higher density development at the corner of Lode Lane and Moat Lane responds well to the corner plot.

The masterplan provides a proposal which is appropriate to the character of the area and its surroundings and conforms to current national and local planning policies. The design concept is based on the following key considerations:

- Connectivity - primary access from Moat Lane, new pedestrian and cycle access from Lode Lane and a new route through Anchor Lane, road infrastructure minimised through the site to give greater priority to pedestrians and cyclists.
- Frontages and Scale - primary frontages along the streets fronting open green spaces, prominent corners, location of site allows greater scale of building at the corner of Lode Lane and Moat Lane.
- Residential - residential blocks adjacent to green spaces, car parking integrated into residential
- Open Space - new green spaces within the development.
- Highways Infrastructure - connectivity between residential sites, convenient on plot parking, shared pedestrian/cycle/vehicular surfaces, green separation between the road and pedestrian routes along the main access road.
- Making use of 'Designing Out Crime' and 'Secured by Design' good practices to help reduce the potential for crime.
- Sustainability – to address the Council's Climate Change declaration (October 2019) and achieve make a full contribution to targets for carbon emissions reduction, including to be at net-zero emissions by 2041.

Viability and Deliverability of the Allocation

We can confirm that the objective of the Council to relocation of the existing Council Depot and bring forward Site SO2 Moat Lane Depot for residential development. The site allocation is both viable and deliverable within the plan period.

Development Phasing

Draft Policy P5 Provision of Land for Housing states capacity for at least 90 new homes to be delivered during Phase III (10-16 years). The Preferred Concept Masterplan illustrates opportunity for residential development, subject to relocation of the Council Depot.

Financial Viability Appraisal (Cushman & Wakefield, 2020)

A viability assessment is being prepared by Cushman & Wakefield. Paragraph 34 of the NPPF confirms Plans should set out the contributions expected from development, including affordable housing and other infrastructure. Such policies should not undermine the deliverability of the Plan.

A scheme compliant with the Draft Submission Plan will be tested to confirm no viability barriers to delivery.

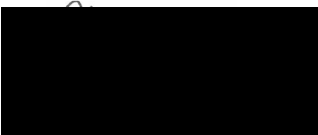
Summary

We support the allocation of Site SO2 Moat Lane Depot within the Local Plan Draft Submission (October 2020) for residential development and consider the proposed allocation, as shown on the Policies Map to include Site SO2 Moat Lane Depot, to be sound.

Site SO2 Moat Lane Depot will provide land for at least 90 new homes to contribute towards the objectively assessed housing need and requirement for 15,017 additional homes across the Plan period to ensure sufficient housing land supply. It is consistent with achieving sustainable development and appropriate in planning terms.

The site is demonstrated as an effective allocation that is deliverable over the Plan period for the reasons set out in this representation. It will be delivered in accordance with a high-quality masterplan-led vision. The proposed development is consistent with national and emerging local planning policy.

Yours sincerely



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