



14<sup>th</sup> December 2020

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Dear Sir/ Madam

**Response to Solihull Local Plan Review (Regulation 19) Consultation**

I write on behalf of my client Spitfire Bespoke Homes in relation to the above consultation. As you will be aware, we have previously submitted representations to the Draft Local Plan Review Consultation in January 2017 and the Local Plan Supplementary consultation in March 2019.

Spitfire Bespoke Homes are a forward thinking, modern, privately owned property development company specialising in the construction of sustainable, high-quality bespoke residential dwellings. Spitfire is an award-winning house builder, and in 2018 won a total of 7 national awards for design excellence including Silver for Best Medium Housebuilder at the Whathouse Awards, Gold for Best Development at the Whathouse Awards and Best Medium Housebuilder at the Housebuilder Awards 2018

Spitfire have a varied range of development sites ranging between 3 dwellings in Henley-on-Thames to 13 new homes on Previously Developed Land near Knowle in the Solihull Green Belt to 125 new homes in Broadway within the AONB, which includes affordable housing extra care provision.

This submission relates to Land at east of Warwick Road and north of Wyndley Garden Centre, Knowle and should be read in conjunction with the following documents:

- Vision Document prepared by Turleys
- Environmental Appraisal prepared by EDP

Having reviewed, the consultation documents we wish to make the following representations:



**Policy P5 Provision of Land for Housing**

***This policy is not considered sound or legally compliant for the following reasons***

Whilst Spitfire Homes welcomes the increase in housing numbers from the previous Supplementary Consultation Document, it is not felt that this goes far enough. A separate representation has been prepared by Barton Willmore on behalf of Barratt David Wilson Homes, IM Land, Spitfire Bespoke Homes, Heyford Developments, and Generator Strategic Land on the Borough’s Housing Need. The conclusions of this representation are supported.

In summary, this representation makes the following conclusions. The NPPF is clear at paragraph 59 that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward”*. Paragraph 60 further states that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance..... In addition to the local housing need figure, any need that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing planned for”*.

In the case of SMBC, policy P5 proposes the following:

- *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. The allocations will be part of the overall housing land supply detailed in the table below.*
  
- *The average annual housing land provision target is 938 net additional homes per year (2020-2036). A trajectory showing how this target will be delivered from all sources of housing land supply is shown below. It will be subject to annual review through the AMR.*

This is based on the minimum identified need of 807dpa and a contribution of 2,015 dwellings across the plan period to help meet the unmet need within the Housing Market Area. This gives a total of 938dpa.

However, as is made clear in the NPPF and within the representations from Barton Willmore and the House Builders Federation (HBF) that this housing need over the plan period has been underestimated. Equally the housing need figure in policy H5 should be expressed as a minimum which is currently is not.

The Borough has significant ambitions over this plan period as identified as Challenge D and Challenge M.

Challenge D looks to secure sustainable and inclusive economic growth including:

- *Meeting Solihull's important regional and sub-regional role*
- *Meeting aspirations of key businesses to enable them to maintain competitiveness (Birmingham Airport, National Exhibition Centre, Birmingham Business Park, Blythe Valley Park, Jaguar Land Rover) whilst contributing to sustainable development.*
- *Retaining and developing a high skilled workforce.*
- *Provide a range of housing to attract inward investment*

Challenge M looks to maximise the economic and social benefits of the High Speed 2 Rail Link and UKC Hub Area including:

- *Creating a sense of place and arrival via a well-connected and integrated interchange, public realm and development opportunities that help support the HS2 Growth Strategy aspirations for employment, skills, environment and infrastructure.*
- *To provide an appropriate planning framework so as to ensure that the potential economic and social benefits of growth enabled by the HS2 rail link and interchange station are delivered.*

These ambitions are of course welcomed, but equally they have implications on ensuring appropriate housing is delivered within the Borough.

The representation prepared by Barton Willmore makes the following conclusions:

- As has been set out above, the policy fails to make it clear that the housing numbers proposed are a minimum figure.
- The Standard Methods minimum need for Solihull (807dpa) will need to be increased to account from expected job growth within the Borough.
- Modelling carried out by Barton Willmore shows that between 1,036 and 1,248 dpa are required to support the UK Central Hub scenario
- 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 a result, this raises significant concerns on the housing numbers set out within policy P5. Therefore, settlements such as Knowle, Dorridge and Bentley Heath which have been identified as being able to accommodate housing growth beyond its own needs should have further land allocated within it to meet housing needs. This is considered further in relation to policy KN2 and more specifically Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020).

***Modifications required to make the plan sound***

In order to make this policy sound and legally requirement a robust reassessment of the housing numbers of the housing numbers are required to ensure that the Borough can meet its own needs and those unmet needs within the Housing Market Area over the plan period.

***Appearing at the Examination***

In relation to this policy, it is anticipated that Barton Willmore would appear at the examination on behalf of Spitfire Homes.

**Policy KN2 South of Knowle (Arden Triangle)**

***This policy is not considered to be sound for the following reasons.***

Along with Balsall Common, Knowle, Dorridge and Bentley Heath are the only rural settlements within the Borough that have a full range of facilities including both secondary & primary schools, health services and a range of shops, services and facilities. It is therefore acknowledged that it can accommodate additional growth over and above its own needs. The additional development proposed for the area will also bring forward a significant number of infrastructure improvements including better public transport, parking and highway improvements, pedestrian and cycling connectivity, new education provision, play and open space, sport and recreation improvements. It is also acknowledged that there will be an emphasis on providing affordable housing (in accordance with the Local Plan) and smaller market homes for young people wishing to stay within the area.

It is acknowledged at paragraph 709 of the draft Local Plan that land to the South of Knowle (policy KN2) has complex land assembly issues. Whilst Spitfire Homes have no objection to the principle of this allocation, it must raise questions as to whether the site can be delivered as expected or whether additional land needs to be included as part of the allocation. In this case a logical extension to this allocation would be Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020). This site is being actively promoted by Spitfire Homes and a vision document has been produced to accompany this submission. The assessment carried out as part of the Councils site assessment suggests this site is within a highly performing assessment of Green Belt (identified as RP38 in the Green Belt Assessment), however this is a significantly larger parcel of land than the site in question and therefore the site should be considered on its own merits.

An Environmental Appraisal of the site has been undertaken by EDP and in respect of Green Belt when the site is considered on its own merits, it scores significantly lower than suggest in the Council site assessment. A summary of the table is shown below.

<b>Purpose</b>	<b>Green Belt Assessment Score</b>	<b>EDP Assessment</b>	<b>Comments</b>
To check the unrestricted sprawl of large built-up areas;	1	1	Both assessments score the same on this purpose.
To prevent neighbouring towns merging into one another;	2	0	In this case, development on this site would not bring the settlement edge of Knowle any closer to Temple Balsall to the east.
To assist in safeguarding the countryside from encroachment;	3	1	The site is considered to have clear defensible boundaries and there is existing built form to the north east and south of the site along with the A4141 running along the western boundary.
To preserve the setting and special character of historic towns	3	0	Development in this location would not have an impact on the setting of Knowle Conservation Area.
Total:	9	2	

The appraisal prepared by EDP concludes that the site could be reasonably removed from the Green Belt and developed in accordance with sound master planning principles without harm to the integrity of the Green Belt overall.

The accompanying vision documents demonstrates how development can be accommodated on the site. The concept masterplan which has been proposed demonstrates that the site could accommodate approximately 40 high quality new homes. Throughout the proposes existing planting has been retained where possible on the site and enhanced in other areas. This ensures a robust boundary is retained to the agricultural land beyond and also allows for ecological enhancements. New areas of public open space are also proposed, adding to the character of the development.

Equally, having regard to the supporting information, there is no reason why this site cannot come forward on its own merits ahead of the site KN2 south of Knowle being delivered. The site is located approximately 800metres south of Knowle Village Centre and can be accessed via the existing footway on the A4141 Warwick Road and the site is therefore well located to take advantage of the local amenities and bus provision in Knowle.

This site is actively being promoted by Spitfire Homes. There are no known constraints which would prevent development. The site is deliverable and could be developed within the next five years providing much needed housing for the Borough. Land at east of Warwick Road and north of Wyndley Garden Centre is considered to be a suitable extension to proposed allocation KN2.

***Modifications required to make the plan sound***

In order to make this policy sound, the allocation should be extended to include Land at east of Warwick Road and north of Wyndley Garden Centre (site 552 in the Site Assessment October 2020).

***Appearing at the Examination***

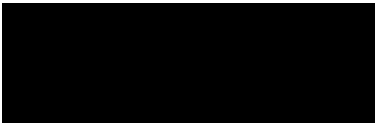
I can confirm that we would wish to appear at the examination in respect of Policy KN2 for the reasons set out above

**Concluding Comments**

As is set out above, a number of modifications need to be made in order to make the plan sound. This includes the inclusion of a number of additional sites to help meet the housing needs identified in the Borough.

I trust the above comments will be taken into consideration. If you require any further information or clarification, please do not hesitate to contact me on the number at the head of this letter.

Yours faithfully



**Guy Wakefield MRTPI**

**Partner**

**For Ridge and Partners LLP**

Enc.

- Land at Knowle Vision Document prepared by Barton Willmore
- Environmental Appraisal prepared by EDP
- Solihull Borough Needs Report prepared by Barton Willmore

WARWICK ROAD  
**KNOWLE**

Vision Document  
December 2020

**SPITFIRE**  
bespoke homes

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**SPITFIRE**  
bespoke homes

**BARTON  
WILLMORE**



# 1. The Vision

“An attractive well-connected residential development of bespoke, high quality homes, set within a strong landscape setting, with a attractive public open space as part of the development.”



## Creation of bespoke, high quality homes

The development will create new, bespoke, high quality homes in the village of Knowle, sensitive to the local setting and context whilst expanding the local residential community.



## A development which sits within the local landscape and responds to the local character

The planting surrounding the site will be maintained and enhanced to add to the character of the development, create new landscaped green boundaries to the development and inform new public open space.



## Climate Response Sustainability

The proposals will have sustainability as a key focus throughout. Promoting active travel, utilising existing features, ensuring accessibility and utilising renewable energy where possible will be a core aspiration of the Site.

## 2. Introduction

This Vision Document has been prepared by Barton Willmore on behalf of Spitfire Bespoke Homes . Spitfire is working with landowners to support proposals for residential development at a site off Warwick Road, Knowle, West Midlands (the Site).

The purpose of this document is to support the promotion of the site to accommodate residential development and associated public open space. The key aims and objectives of the document are to:

- Present a vision and design framework to guide and shape the proposals
- Review the site in the context of current Planning Policy
- Present an initial understanding of the site and the local context
- Present the emerging concept masterplan, supported by an explanation of the key design principles that have informed it.

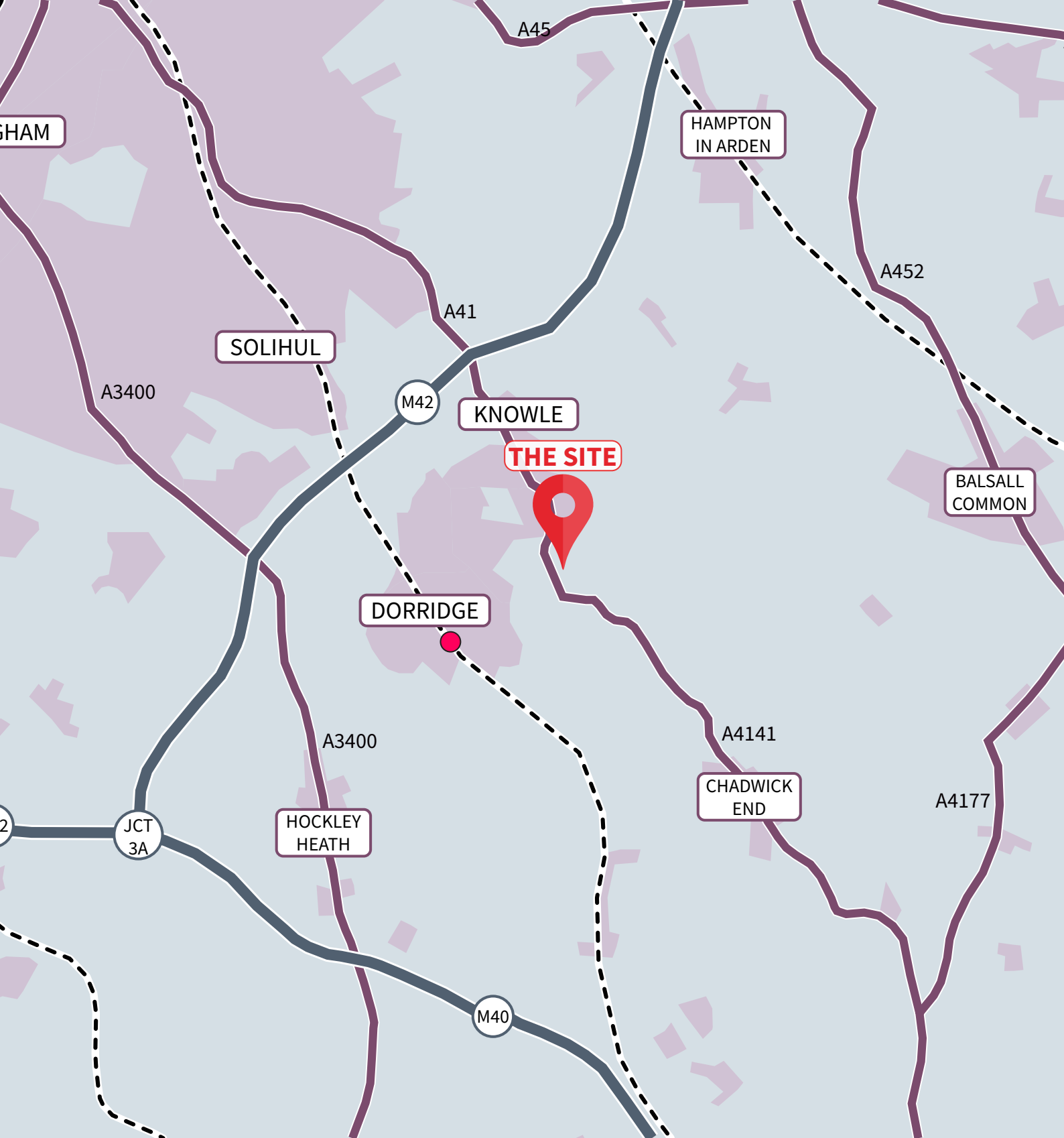
### Site Location

The Site is located off Warwick Road, Knowle and is divided into two parcels, one north and one south of a private road off Warwick Road.

Knowle is a village within Solihull Metropolitan District, West Midlands, situated 2.5 miles south-east of Solihull and 1 mile north-west of Dorridge.

The village is predominantly centred along the A4141, High Street/Warwick Road.

The Site is located on the southern edge of Knowle and both parcels are accessed from the A4141, Warwick Road which runs along the Site's western boundary.



Wider Location Plan

## The Site

The Site measures 2.2ha and is currently in agricultural use. It is bounded as follows:

**Northern Boundary:** The rears of existing dwellings and boundary planting lie directly to the north-east of the Site with the field extending slightly to the north-west with boundary planting beyond.

**Eastern Boundary:** The rears of existing properties and an agricultural building with agricultural fields beyond lie to the east with boundary planting marking the edge of the Site.

**Southern Boundary:** Boundary planting marks the southern edge of the Site with Wyndley Garden Centre beyond.

**Western Boundary:** The A4141, Warwick Road runs along the Site's western boundary with boundary planting marking the edge of the Site.

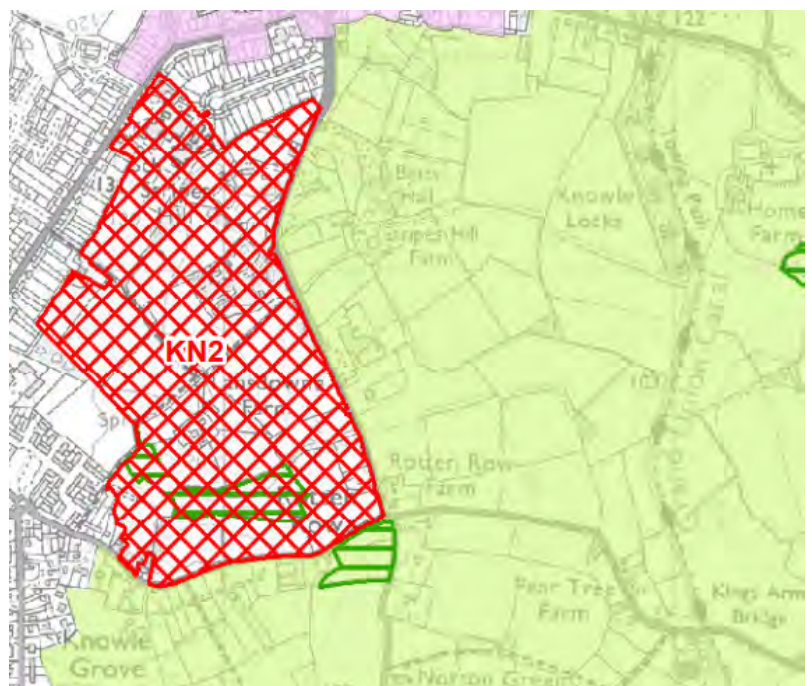
## Planning Context

The Site is located within the Green Belt and is opposite a proposed housing site KN2 as shown on the plan below.

There are no listed buildings in close proximity to the site.

Site KN2 (land South of Knowle) is proposed to be allocated for 600 dwellings together with the redevelopment of the Arden Academy Secondary School and new primary school to be provided within the Draft Submission Plan 2020. As is demonstrated within this vision document, land to the east of Warwick Road and north of Wyndley Garden Centre should be included within this allocation.

It was originally suggested that allocation KN2 could deliver 750 dwellings, but this was revised downwards to 600 dwellings in the 2019 consultation and this current consultation. With the proposed allocation coming forward opposite the site, this parcel of land will become significantly more accessible and therefore is suitable as a further phase of development.





Station Road

A141 (Warwick Road)

— Site Boundary

Site Location Plan

### 3. Site Context

The Site is well connected, located on the southern edge of Knowle within walking distance of facilities and services in Knowle and the surrounding area.

#### Access & Movement

The Site is accessed from the A4141, Warwick Road. Warwick Road provides excellent vehicular connectivity directly to the M42 and the A41 into Solihull and Birmingham to the north, with further connections available beyond into the wider strategic road network.

The Site is located within walking distance (0.5 miles / 10 minutes) of services in Knowle village centre.

The Site is also within walking distance of regular bus services to Solihull and Balsall Common.

There is a network of Public Rights of Way in the surrounding area with a PRoW directly opposite the Site leading towards Knowle Green and Dorridge, including Dorridge Train Station a 22 minute walk from the Site.

#### Train Services

The closest railway station is Dorridge which can be reached by a 3 minute car journey or 22 minute walk. Dorridge provides regular services to Birmingham Snow Hill and Moor Street, Stratford-upon-Avon, Leamington Spa, Kidderminster and Stourbridge.

#### Bus Services

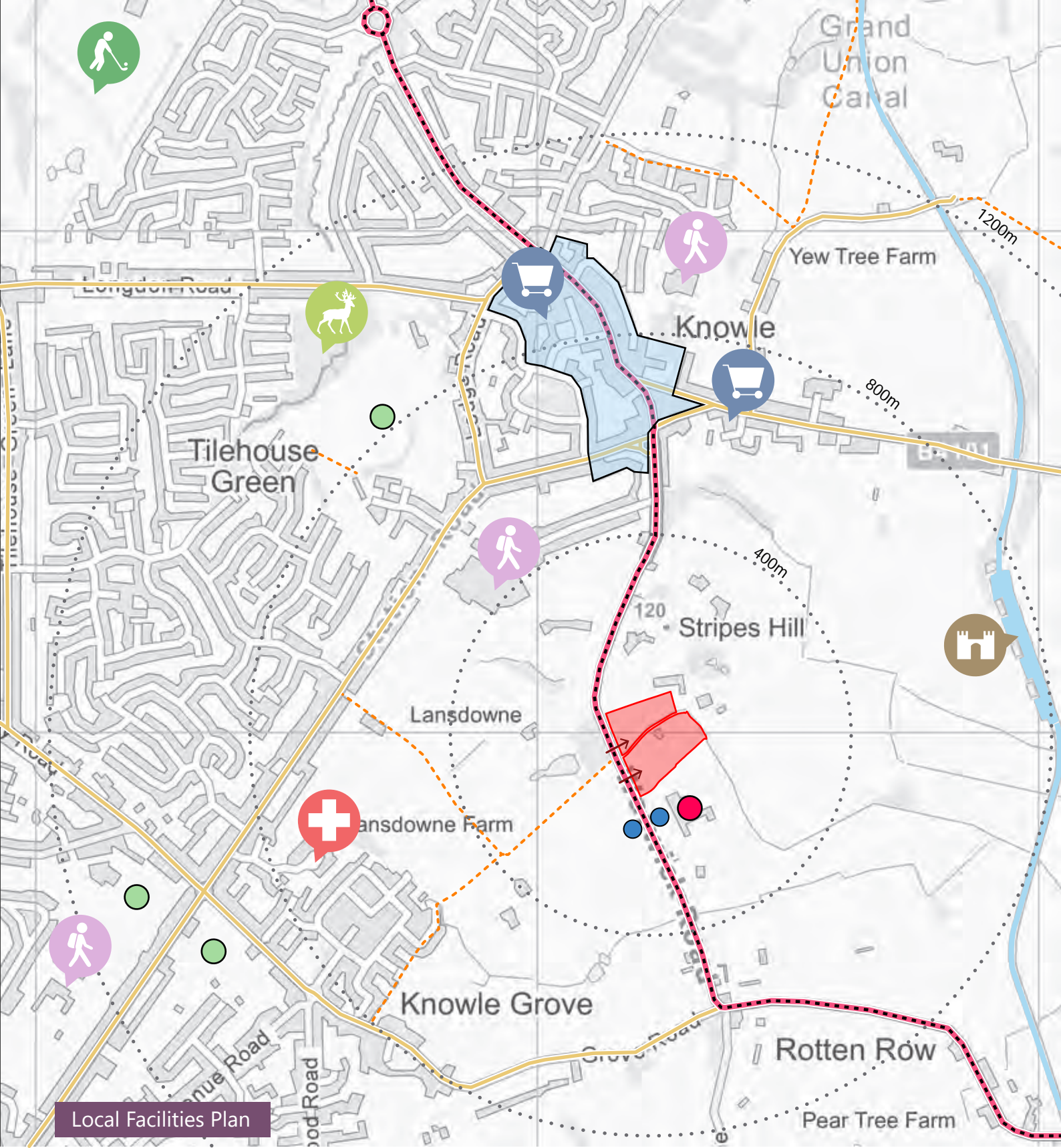
The closest bus stops to the site are located:

- On Warwick Road 0.1 miles / 2 minutes walk to the south serving the 88 route.



















The 88 route runs between Solihull and Balsall Common with a daytime frequency of once every two hours.

#### Local Facilities & Services

Type	Description	Walking Distance	Walk / Cycle Time
Education	Arden Academy	0.8 km / 0.5 miles	10 minutes / 3 minutes
	Knowle CofE Primary School	1.1km / 0.7 miles	14 minutes / 5 minutes
Retail	Tesco Metro	1.0 km / 0.6 miles	13 minutes / 6 minutes
	Knowle Local Centre	0.8 km / 0.5 miles	10 minutes / 3 minutes
Pubs, Cafes, Restaurants and Leisure	Wyndley Garden Centre	0.2 km / 0.1 miles	2 minutes / 1 minute
	Knowle Local Centre Pubs / Restaurants	0.5 km / 0.3 miles	6 minute / 2 minutes
Medical Facilities	Arden Medical Centre, Solihull CAMHS, Knowle and Dorridge Dental Practice	1.3 km / 0.8 miles	16 minutes / 7 minutes



Local Facilities Plan

- |   |  |   |
|---|--|---|
|  Site Boundary        |  Grand Union Canal              |  Nearby Schools                        |
|  Local Centre         |  Walking Distances              |  Nearby Shops                          |
|  Site Access          |  Bus Route (No.88)              |  Arden Medical Centre & Solihull CAMHS |
|  Warwick Road (A4141) |  Closest Bus Stops to Site      |  Historic Knowle Locks                 |
|  B & Local Roads      |  Wyndley Garden Centre          |  Copt Heath Golf Club                  |
|  Public Rights of Way |  Local Parks and Playing Fields |  Jobs Close Nature Reserve             |

## 4. Opportunities & Constraints

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the Site.

The composite plan in this section presents the analysis of these elements, the qualities of the site and its immediate setting that provides the context for future development proposals. The positive features and opportunities on and around the site should be retained, enhanced and incorporated into the scheme where possible, to strengthen local distinctiveness.

### Key Opportunities

There is significant existing vegetation (hedgerows, trees and other planting) along the Site boundaries and within the site which can be retained and enhanced to add character to the development.

The Site is in close proximity to nearby public transport with Bus Stops within two minutes' walk from the Site and Dorridge Train Station, a 22 minute walk from the Site.

There is potential for new access points directly onto Warwick Road.

There are local community facilities, shops and schools within walking distance of the Site.

There is an opportunity to provide a new, strong landscaped buffer along the Site's northern boundary.

There is an opportunity to provide a new Sustainable Drainage System including new attenuation ponds and swales, informed by the Site topography.

The Site is located entirely within Flood Zone 1 and is therefore suitable for development.

There is an opportunity to create a new area of Public Open Space as part of the development.

### Key Constraints

There is a High Voltage Overhead line running across the northern parcel of the Site which will need to be considered and possibly rerouted subject to further investigation at a later stage.

Due to drainage constraints, the area to the east of the southern parcel should be retained for Public Open Space rather than development.





Site Opportunities and Constraints Plan

- Site Boundary
  - - - - - Indicative Access Points
  - Proposed Drainage Attenuation Feature
  - - - - - Existing Ditch Courses
  - Potential Foul Pump Station
  - Warwick Road
- Low Voltage Overhead Lines
  - - - - - High Voltage Overhead Lines
  - - - - - Water Supply Lines
  - - - - - Gas Lines
  - Existing Building on Site to be Demolished
  - Wyndley Garden Centre
- Site Allocation KN2
  - Potential Swales
  - Area to be Retained as Public Open Space
  - - - - - Low Voltage Underground Lines
  - - - - - Public Rights of Way

## Air Quality

The site is not located in or near to an Air Quality Management Area (AQMA). The primary influence of air quality conditions on the site is likely to be the adjacent A4141, Warwick Road. However, any appropriate mitigation can be accommodated by development proposals for the site.

**Overall, there are not considered to be any significant air quality or odour constraints which would restrict development on the site.**

## Ground Conditions

Following a review of available published data, the underlying bedrock on the site is Sidmouth Mudstone, a sedimentary bedrock formed over 200 million years ago. The northern extremity of the site may overlap with the Arden Sandstone formation, which is also a sedimentary bedrock.

There are no historic landfill sites on or in close proximity to the site. The site is greenfield and undeveloped and as such is not anticipated to pose any specific concern for residential development.

**There are no significant constraints to development from a Ground Conditions perspective.**

## Noise

The existing noise climate is likely to be primarily influenced by road traffic on Warwick Road, located to the west of the proposed development site and potentially in addition, Wyndley Garden Centre to the immediate south of the site.

The Noise Assessment will be undertaken and will determine what mitigation measures (if any) are required to facilitate the development. It is anticipated that with an appropriate acoustic mitigation strategy, levels of amenity could be achieved that are appropriate for residential use.

**There are no significant constraints to development from a Noise perspective.**

## Utilities

The site contains electric and telecommunications infrastructure that are owned and maintained by the incumbent utility companies, Western Power Distribution and Openreach, with the wider site vicinity containing gas and foul water apparatus under the ownership of Cadent Gas and Severn Trent Water Limited.

**It is not anticipated that any of the utilities identified are in any way a barrier to the development site. It is considered that there is no reason for the development to not be allocated from a utilities perspective.**

## Flood Risk and Drainage

A review of surface water flood maps indicates a potential flood flow routes through the site, which cross the site from west to east. Much of this is shown to be 'low risk' 1 in 1000-year extent and to be broad and very shallow. This national scale mapping is coarse is undertaken at a high level and provides an indication of risk only. The mapping does not appear to account for the formal ditch system that is present on site and shown on OS mapping, nor does it pick up the large pond shown on OS & aerial mapping on land to the west of Warwick Road. The actual flood risk to the site is considered to be low once these features are fully accounted for.

The underlying geology is formed of Sidmouth Mudstone, with no recorded Superficial Geology. It is not envisaged the prevalent soils and underlying geology will be suitable for infiltration (soakaway) drainage. As such, it is proposed that surface water from the development continue to discharge to the ditch system that runs through the centre of the site and continues off site in a south easterly direction before its confluence with the Cuttle Brook east of the Grand Union canal.

Sustainable Drainage will be incorporated into any proposed development to provide a minimum of two stages of treatment of surface water runoff quality. Development drainage from the site will be attenuated to greenfield equivalent rates with attenuation provided up to the extreme 1 in 100-year storm event, with an additional allowance for climate change, in line with national planning and local water management policy. Features to be considered within the development include porous paving, vegetated swales and/or detention basins.

**Overall, it is considered that flood risk and drainage would not provide any significant constraints to development at this site.**

## Access and Highways

The development site comprises two parcels of land split by a private access track which will be retained. The two parcels will be independently accessed from the A4141 Warwick Road with their own dedicated junctions. There may be the potential that the two parcels could subsequently linked in the future.

The access points have been designed to give an appropriate level of visibility along the A4141 Warwick Road and provide an appropriate junction to meet the needs of the size of the development.

The site is just 800m south of Knowle Village Centre which can be accessed via the existing footway along A4141 Warwick Road. The site lies within a 15-minute walk of a number of amenities including shops, primary and secondary school provision, leisure facilities and a GP surgery. This site is also situated approximately 800m from the nearest bus stop.

The proposed development is well located to take advantage of the local amenities and bus provision in Knowle. Along with the future facilities on the Arden Triangle site, the provision of a proportionate sustainable travel offering will benefit the future users of the developments in this location.

**Overall the site is in a highly accessible and sustainable location, which good connectivity and facilities nearby.**

## 5. Concept Masterplan

### Key Guiding Design Principles




The plan for the Site has been informed by the vision, site analysis and identified constraints and opportunities. The plan shows the key design principles which underpin the development of the site, as set out here (numbers correspond to the plan opposite).

- The development proposals outline the residential development potential of the Site to incorporate approximately 40 high quality new homes.
- Existing planting on the Site has been retained where possible and enhanced to create new landscaped buffers to site boundaries as well as enhancing the character of the Site. In particular, clusters of mature trees along the southern and eastern borders of the Site will be retained as part of the development.
- New areas of public open space proposed on the Site will be well overlooked and attractive and will include new and existing planting as well as incorporating the new attenuation ponds which will be located on the Site.
- The Site's principal vehicular accesses will be taken from the A4141, Warwick Road to the west.

- ① Landscape Buffer - Existing and proposed planting knits the development into the surrounding landscape, creating a green boundary whilst maintaining views and privacy for both existing and proposed dwellings.
- ② Adjacent Houses - Houses adjacent to the site are factored into the design with proposed dwellings backing on and continuing the building line where possible.
- ③ Key Gateways and Frontages - The positioning of key frontages and dual aspect homes will create a development which is well overlooked, secure and legible.
- ④ New areas of public open space - New areas of open space which include attenuation ponds informed by the Site's topography will be well overlooked and attractive, adding character to the development.
- ⑤ Proposed Site Access Points - Taken from the A4141, Warwick Road.



Concept Masterplan

-  Site Boundary
  -  Primary Access
  -  Proposed Development Area
  -  Proposed Infrastructure
  -  Proposed Attenuation
  -  Proposed Public Open Space
-  Existing Trees & Hedgerows

## 6. Development Benefits

The proposal will deliver an attractive well-connected residential development with potential to provide approximately 40 high quality homes, set within a strong landscape setting, with attractive public open space as part of the development.



### Creation of bespoke, high quality homes

The development has the potential to incorporate approximately 40 new high quality homes within the village of Knowle, sensitive to the local setting and context whilst expanding the local residential community.



### A development which sits within the local landscape and responds to the local character

The planting surrounding the site will be maintained and enhanced to add to the character of the development, create new landscaped green boundaries to the development and inform new public open space.



### Climate Response Sustainability

The proposals will have sustainability as a key focus throughout. Promoting active travel, utilising existing features, ensuring accessibility and utilising renewable energy where possible will be a core aspiration of the Site.

## 7. Spitfire Experience and Deliverability

Spitfire are committed to delivering high quality homes for the Site off Warwick Road, Knowle. We are a forward thinking, modern, privately owned property development company specialising in the construction of sustainable, high – quality bespoke residential dwellings. Backed by its parent company IM Group Limited, Spitfire has a fantastic platform in the housing development industry; IM Properties portfolio is currently valued in excess of £1bn and benefits from its geographical diversity across the UK, Germany and the USA.

Spitfire is passionate about design, sustainability and quality of construction, their bespoke approach towards design has resulted in beautifully designed homes with a real sense of individuality. As a company we have a wealth of skills, experience and creative flair to make not just houses but homes for communities.

Recognition for Spitfire's approach to design has resulted in winning the Silver 'Housebuilder of the Year' award at the Insider Residential Property Awards 2017. In 2018, Spitfire was also awarded a Highly Commended for 'Best Family Home' at the Evening Standard New Homes ceremony; 'Best Medium Housebuilder' and 'Best Design' at the Housebuilder Awards; as well as winning in the 'Best Medium Housebuilder' (Silver) and 'Best Development' (Gold) categories at the WhatHouse? Awards.

At the Evening Standard New Homes Awards 2019 Spitfire won Best Small Development for Haseley Manor.









**Warwick Road,  
Knowle**

**Environmental  
Appraisal**

Prepared by:  
**The Environmental  
Dimension  
Partnership Ltd**

On behalf of:  
**Spitfire Bespoke  
Homes Ltd**

December 2020  
Report Reference  
**edp3776\_r002a**

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## Appendices

<b>Appendix EDP 1</b>	Draft Local Plan Proposals Map
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## Plans

<b>Plan EDP 1</b>	Environmental Planning Context (edp3776_d002b 14 December 2020 AL/WG)
<b>Plan EDP 2</b>	Landscape Character and Context (edp3776_d001b 14 December 2020 AL/WG)

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## **Section 1**

### **Introduction**

- 1.1 Spitfire Bespoke Homes Ltd has appointed The Environmental Dimension Partnership Ltd (EDP) to undertake landscape, ecology and heritage studies in relation to Warwick Road, Knowle (the site).
- 1.2 EDP is an independent environmental consultancy providing advice to landowner and property development clients in the public and private sectors in the fields of landscape, ecology, heritage, arboriculture and masterplanning. The Practice operates throughout the UK from offices in Cardiff, Cirencester and Cheltenham. Details of the Practice can be obtained at [www.edp-uk.co.uk](http://www.edp-uk.co.uk).
- 1.3 This document provides an overview of EDP's desk-top and field appraisals in relation to landscape matters (**Section 2**), ecology matters (**Section 3**), and heritage matters (**Section 4**). A summary of the findings for each can found at **Section 5**.

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## Section 2 Landscape

### Introduction

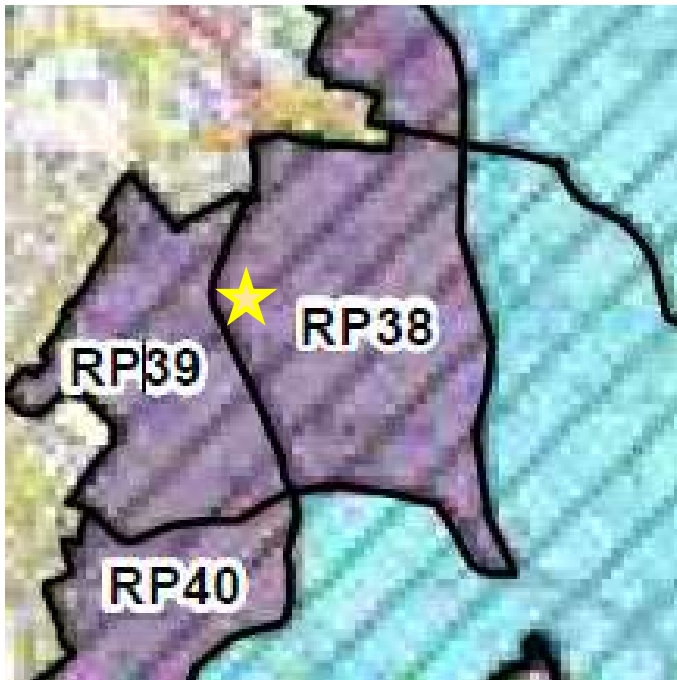
- 2.1 The purpose of EDP's work is to advance the current understanding of the landscape and visual considerations and provide evidence of the suitability of the site for sustainable development in this regard.
- 2.2 This preliminary landscape and visual appraisal has been informed by a desk study and a brief site walkover, undertaken during December 2016. The information derived is discussed below.

### The Site

- 2.3 The site boundary as defined on **Plan EDP 1** identifies the area of land that is currently within Spitfire Bespoke Homes Ltd control.
- 2.4 The site lies to the south-east of Knowle within the Solihull Metropolitan District. It comprises two land parcels and lies adjacent to Warwick Road (A4141). The site contains two pasture land parcels, the northern parcel comprises pasture while the southern parcel is further subdivided into horse paddocks, it also contains a number of shelters and a temporary caravan associated with intensive equestrian activity. The site is bisected by an access road leading to Stripes Hill Farm.
- 2.5 The site is enveloped by a transport route, residential and commercial dwellings and features strong vegetated boundaries. Warwick Road (A4141) contains the site to the west; residential dwellings enclose the north-east corner of the site and a strong vegetated tree line combines with farm buildings to enclose the eastern boundary. A large commercial garden centre with densely vegetated boundary contains the site from the south.
- 2.6 The character of the site is influenced by both settlement, transport routes and the land uses of the site itself.

### Planning Background

- 2.7 Atkins Limited was commissioned by Solihull Metropolitan Borough Council (SMBC) to carry out a strategic review of the Green Belt in Solihull in preparation of the emerging local plan (Draft Local Plan Issued November 2016). The site was considered in the Solihull Strategic Green Belt Assessment (July 2016) as part of the area RP38. **Figure EDP 2.1** indicates the approximate site location within RP38. It is clear that the site is considerably smaller than RP38, which warrants further assessment specifically of the site against the purposes of the Green Belt.



**Figure EDP 2.1:** Approximate location of site (yellow star) within Atkins parcel RP38.

- 2.8 The Atkins review assessed the extent to which land designated as Green Belt in Solihull performs against the purposes of Green Belt as set out in paragraph 134 of the National Planning Policy Framework (NPPF) and is intended to form the basis for a future, more detailed assessment. In relation to RP38 the document concludes that the Green Belt is higher performing in purposes 3 and 4 and therefore:

*“...is characterised by countryside, adjoins countryside and does not contain any development; and*

*... is adjacent to a Conservation Area within a historic town and there are clear views of landmarks and/ or the historic core.”*

- 2.9 The purpose of this assessment, undertaken by a Chartered Landscape Architect is to advance the current understanding of the performance in landscape and visual terms of the site against the five purposes of the Green Belt and provide a commentary on the suitability of the site for sustainable development in this regard.
- 2.10 Furthermore, this assessment considers the impact on the site and its suitability should the mixed development (Arden School and Residential) adjacent to Warwick Road come forward in the manner proposed within the draft local plan (**Appendix EDP 1**).

## **Landscape Related Designations and Policy**

2.11 Landscape related designations are shown on **Plan EDP 1**:

- The site falls within the Solihull Metropolitan Green Belt;
- Tilehouse Green Moated Site Scheduled Monument is situated within 2km of the site and Preceptory at Temple Balsall Scheduled Monument is situated within 3km of the site;
- Two Sites of Special Scientific Interest (SSSI) designations feature within 2km of the site, these include Brock Meadow, Darley Green and the River Blythe;
- There are 11 Ancient Woodland Sites within the 3km search area of the site;
- There are a number of listed buildings within the Knowle Conservation Area approximately 500m north of the site including the Grade I listed Parish Church;
- There are no Tree Preservation Orders on or adjacent to the site;
- There is no public right of access onto the site and none of the site is open access land; and
- The Grand Union Canal Promoted Route is location c.800m to the east of site.

2.12 There are no 'in principle' constraints on ecological grounds. There are no statutory designations within the site, nor any within the site's likely zone of influence (Zoi), that would be adversely affected as a result of the proposed development. This report has not considered non-statutory ecological designations (local wildlife sites), the site itself has considerable scope for enhancement through more sympathetic management. Furthermore, the site has the potential to contain a range of protected species for which surveys will be required. It is anticipated that any protected species populations can be readily accommodated within an appropriate layout and associated green infrastructure.

### ***National Designations***

2.13 The site lies within the Solihull Metropolitan Green Belt, where the Green Belt boundary meets the eastern settlement edge of Knowle. Knowle itself is not 'washed over' by the Green Belt and the settlement currently falls outside the designation.

#### *Green Belt*

2.14 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are openness and permanence. As such, Green Belt is a planning policy designation rather than a landscape designation based on landscape character and value.

- 2.15 The NPPF paragraph 134 sets out five purposes of the Green Belt, which are listed below:
- “To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns; and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”
- 2.16 The NPPF sets out guidelines for local planning authorities (LPAs) in relation to Green Belts including: the desire to plan positively to enhance their beneficial use, looking for opportunities to provide access, outdoor sport, and recreation; and to retain and enhance landscapes, visual amenity, and biodiversity; or to improve damaged and derelict land.
- 2.17 Guidance in paragraphs 138 and 139 makes clear that, when reviewing Green Belt boundaries, LPAs should take account of the need to promote sustainable patterns of development; they should consider the consequences for sustainable development of channelling development towards urban areas, towns, and villages within the Green Belt or towards locations outside the Green Belt boundary. This will be considered further in the Planning Statement accompanying the consultation response.
- 2.18 Also of relevance to this report is guidance in paragraph 139 with regard to defining boundaries, which states that local authorities should *inter alia*:
- Not include land that it is unnecessary to keep permanently open; and
  - Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

### ***Interim Conclusions***

- 2.19 The site does not fall within or contain a national landscape designation. However, the site does lie within the designated area of green belt. Collectively, the area surrounding the site contains a number of nationally and locally designated ecological and heritage assets. At the local level, one Public Right of Way (PRoW) runs south-west from the site’s western boundary.



### **Local Policy**

2.20 Local landscape policy of relevance to the site is contained within Solihull Local Plan 2011 to 2028 (Adopted 2013) and within the draft Solihull Local Plan – Draft Submission Plan. Policies relevant to this site are noted below:

- POLICY P5 – Provision of Land for Housing;
- POLICY P10 – Natural Environment;
- POLICY P14 – Amenity;
- POLICY P15 – Securing Design Quality;
- POLICY P17 – Countryside and Green Belt;
- POLICY P18 – Health and Well Being; and
- POLICY P20 – Provision for Open Space, Children’s Play, Sport, Recreation and Leisure.

### *Policy Discussion*

2.21 As described above, the whole of the site lies within the designated Green Belt. This is a long-standing and well-established development control tool which is embodied within the current Solihull Local Plan 2011 to 2028 (Adopted 2013) at Policy P17.

*“The Council will not permit inappropriate development in the Green Belt, except in very special circumstances. In addition to the national policy, the following provisions shall apply to development in the Borough’s Green Belt:*

- *Development involving the replacement, extension or alteration of buildings in the Green Belt will not be permitted if it will harm the need to retain smaller more affordable housing or the purposes of including land within the Green Belt;*
- *Limited infilling will not be considered to be inappropriate development within the Green Belt settlements, providing this would not have an adverse effect on the character of the settlements. Limited infilling shall be interpreted as the filling of a small gap within an otherwise built-up frontage with not more than two dwellings;*
- *The reasonable expansion of established businesses into the Green Belt will be allowed where the proposal would make a significant contribution to the local economy or employment, providing that appropriate mitigation can be secured; and*
- *Where the re-use of buildings or land is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land*

*in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.”*

2.22 The draft Solihull Local Plan – Draft Submission Plan was published in October 2020. Like the current Solihull Local Plan 2011 to 2028, Green Belt is used as a development control. In the draft submission the policy has changed to accommodate the shortfall in housing within the Solihull Borough. The draft Green Belt policy is at Policy P17 of the Solihull Local Plan – Draft Submission Plan:

1. *“The Council will safeguard the “best and most versatile” agricultural land in the Borough unless there is an overriding need for development that outweighs the loss, and will seek to protect the character of the countryside.*
2. *Land designated as Green Belt in the Borough is identified on the Policies Map and will be kept permanently open, in accordance with national Green Belt policy.*
3. *Inappropriate development will not be permitted in the Solihull Green Belt, unless very special circumstances have been demonstrated in accordance with the NPPF. Paragraphs 145 and 146 of the NPPF set out forms of development that are not regarded as inappropriate. In interpreting these paragraphs the following provisions will apply:*
  - *Limited in-filling or redevelopment may take place in the following settlements without constituting an inappropriate development:*
    - *Chadwick End*
    - *Cheswick Green*
    - *Millison’s Wood*
    - *Tidbury Green*
  - *Limited infilling in villages shall be interpreted as the filling of a small gap within an otherwise built up frontage with not more than two dwellings.*
  - *Disproportionate additions shall be interpreted as additions that are more than 40% of the original floorspace of the building.*
  - *Where the re-use of buildings or land is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings.”*

- 2.23 The Spatial Strategy (paragraph 58-70) of the Solihull Local Plan – Draft Submission Plan recognises that housing targets have not been met and the consent for the HS2 proposals in April 2020 has resulted in an increase in growth and in housing. The Solihull Local Plan – Draft Submission Plan makes it clear that developing Green Belt and expanding rural settlements is an option in accommodating growth. The Spatial Strategy identifies 7 options for development opportunities on Green Belt. The site falls within “*Growth Option G – Significant Expansion of Rural Villages/Settlements*” and sits within “*Land south of Knowle*”.
- 2.24 A Solihull Local Plan Concept Masterplan (October 2020) has been published alongside the Solihull Local Plan – Draft Submission Plan to help set out the vision and spatial strategy for the Borough up until 2036. The plan identifies sites for potential development in 20 potential allocations to deliver the housing needs. The thirteenth site identifies an area south of Knowle (Policy KN2: South of Knowle). The development is located south and west of the site and proposes 600 housing units.
- 2.25 It should be noted that neither the adopted nor the draft local plan proposals map define settlement boundaries. For the purposes of the assessment and discussion below this report has considered the Office for National Statistics ‘Built up Areas’ dataset and is presented on **Plan EDP 1**. Census data outputs for built-up areas (previously called urban areas) have been produced from the 2011 Census. The methodology follows a ‘bricks and mortar’ approach, areas defined as built-up have a minimum area of 20hectares (ha) and settlements within 200 metres of each other are linked. The coarseness of the data shown on **Plan EDP 1** is due to the methodology, which takes as its starting point a 50m grid to classify land cover information for each of the features within each cell.

## **Landscape Character and Visual Considerations**

### ***National Character***

- 2.26 The site falls within Natural England’s National Character Area (NCA) No 97 ‘Arden’ which is briefly described as “*gently rolling with small fragmented semi-natural and ancient woodlands. Mature oaks set in hedgerows, distinctive field boundaries, historic parklands and narrow river corridors are key features, all on the doorstep of a heavily urbanised area*”. The key characteristics of this NCA, of relevance to the site, are:
- “*Well-wooded farmland landscape with rolling landform;*
  - *Diverse field patterns, ranging from well hedged, irregular fields and small woodlands that contrast with larger semi regular fields;*
  - *The area is dominated by urban development and associated urban edge landscapes;*
  - *Common oaks are still the dominant tree species and can be found both within towns and villages and as part of the hedgerow systems;*

- *The area is made up of a landscape of hedged, irregular fields and small woodlands. Narrow, often sunken lanes link scattered farms and there is a real sense of being closed in with restricted views; and*
- *The Knowle basin, is relatively low lying and separates the higher ground of the Warwickshire coalfield in the east and the eastern edge of the South Staffordshire (Black Country) coalfield to the west.”*

**Warwickshire Landscape Guidelines (November 1993)**

2.27 The Warwickshire landscape guidelines locate and characterise the site within the ‘Arden Pastures’. The guidelines note the overall character and qualities of the area as a ‘small scale, enclosed landscape, often pervaded by suburban influences and characterised by small fields, typically bordered by mature hedgerow trees. Character features include:

- *“A gently rolling topography;*
- *A well-defined pattern of small fields and paddocks;*
- *Numerous mature hedgerow oaks;*
- *Permanent pasture often grazed by horses;*
- *A network of minor lanes often with ribbon development; and*
- *Many place names ending in Heath”.*

*Solihull Borough Landscape Character Assessment*

2.28 This Landscape Character Assessment (LCA) was commissioned by SMBC in July 2016 and forms part of the evidence for the emerging local plan. It has been prepared by Waterman Infrastructure & Environment Ltd.

2.29 The site falls entirely within LCA 3 ‘Knowle & Dorridge Fringe’ which arcs around the settlements northern, eastern and southern boundaries. The key characteristics of this area relevant to the site are:

- *“Small blocks of woodland are scattered across the area, a number of these are ancient woodlands, Local Wildlife Sites and Local Nature Reserves. The woodlands are a valuable asset and combined with the winding lanes, mature hedgerow trees and ditches/watercourses running across the fields they provide a rich complexity and strong structure to the landscape...;*
- *..being in close proximity to Knowle and Dorridge, shows signs of urban influence especially within the northern extent of the LCA on the approaches to the settlement of Knowle.;*

- *Land use is varied with some residential development, individual farmsteads, horsiculture, parkland and agricultural land (mostly Grade 3 with some Grade 4).;*
- *Mature hedgerow trees are a key feature within the area, although some have become tall and leggy through lack of management. A few individual scattered trees are also noted within the northern extent of the area where oak and ash are the two dominant species.;*
- *Most built form in the area consists of red brick and/or render with tiled roofs. Timber and brick buildings are present along Warwick Road and Norton Green Lane to the east of the LCA.; and*
- *The Grand Union Canal forms the eastern boundary of the LCA and is also used for mooring specifically in close proximity to Knowle.”*

#### Sensitivities and Pressures

2.30 The following sensitivities and pressures within the landscape of the ‘Knowle and Dorridge Fringe’ relevant to the site include:

- *“Limited footpath network close to urban edge places walkers on narrow and dangerous roads;*
- *Overgrazing of land by horses gives the appearance of over use, degraded landscape and impacts upon biodiversity. Inappropriate fencing also impacts on rural character; and*
- *Neglect of field barns and vernacular buildings is impacting upon landscape character”.*

#### Sensitivity and Capacity

2.31 The assessment considers visual sensitivity of the area to be low, due to the relative visual containment. Landscape value is assessed as medium due to the presence of strong landscape fabric, historic sites and the Grand Union Canal Walk promoted route. Overall the assessment considers that the landscape could accommodate small areas of new development of an appropriate type, scale, form and vernacular. Furthermore, development should not result in the loss of irreplaceable habitats and should preserve the setting of the Grand Union Canal and Knowle Conservation Area.

#### **EDP Site Character and Visual Assessment**

2.32 The character of the site and its immediate surroundings are generally consistent with published assessments, outlined above, particularly in relation to the ‘rolling landform’ and ‘well wooded farmland landscape’. The areas of woodland to the north-east and west of the site combine with the topography to the west and north in substantially limiting intervisibility between the site and its surrounding context (**Photograph EDP 1**).



**Photograph EDP 1:** Illustrating visual containment of the site. Taken from the approximate site centre facing northwards.

- 2.33 The published assessment also recognises the diverse irregular field patterns and hedge field enclosures in the area. The lack of unity in the landscape is very evident in the immediate vicinity of the site where dispersed residential developments, large retail units, remnant field parcels and urban fringe uses combine with strong landscape fabric (tree belts and pockets of woodland) to create a poor legibility and limited cohesion across the landscape area.
- 2.34 In visual terms, the site is well-contained by vegetation either side of Warwick road and undulating topography to the west. Residential dwellings and agricultural buildings feature on the northern and eastern boundary (**Photograph EDP 2**), which combine with strong mature tree lines to screen the site.



**Photograph EDP 2:** Illustrating visual containment of the site by existing residential and agricultural buildings. Taken adjacent to the eastern site boundary facing northwards.

- 2.35 The adjacent garden centre has a strong visual presence and removes any perception of 'open countryside' to the south of the site (**Photograph EDP 3**). Views from the north of site are screened by mature site boundary vegetation and woodland copses within the landscape which prevent intervisibility with Kenilworth Road (B4101). Filtered views are attainable from the promoted route of Grand Union Canal Walk in the proximity of Knowle Locks. In such views the garden centre appears rather abrupt and expansive (**Photograph EDP 4**). This is also very evident on the southern approach to Knowle along Warwick Road (A4141) where the garden centre buildings, car parking, fencing and recycling centre are all very suburban in character (**Photograph EDP 5**).



**Photograph EDP 3:** Illustrating visual presence of the garden centre to the south of site, and characteristic mature common oak trees within site boundary hedgerows. Taken from the western portion of the site facing southwards.



**Photograph EDP 4:** Illustrating the visual context experienced from Grand Union Canal Walk to the north-east of the site. The white buildings of the garden centre are visible as are the agricultural buildings to the east of the site. Taken from Knowle Canal Locks facing west toward the site.





**Photograph EDP 5:** Illustrating the visual context experienced on the approach to Knowle. The buildings, parking, fencing and recycling facilities of the garden centre result in a suburban character on the approach. Taken from adjacent and to the south of the Garden Centre entrance.

- 2.36 The site's environmental planning constraints, landscape context and character have been identified by EDP following a site visit and data trawl and are presented on **Plans EDP 1** and **2**. The findings are broadly consistent with the above published character assessments and the further discussion below.
- 2.37 While the site may be regarded as 'open countryside' for planning purposes, its current intensive equestrian land use (**Photograph EDP 6**) and visual character is such that it does not form part of the more functionally intact agricultural landscape to the east and south-east. In addition, the garden centre to the south acts to separate the site from the wider agricultural landscape and exerts further urbanising influence on the site's character.



**Photograph EDP 6:** Illustrating current intensive equestrian land use and scattered structures. Taken from the approximate site centre facing eastwards.

- 2.38 It should be noted that it is not necessary to hide new development in this landscape context; built development (including housing) is already an established and frequent component of the visual character of the area, so new development will not be inappropriate, unexpected or discordant as part of the views.
- 2.39 In summary, in visual terms, the site is relatively contained by topography and vegetation. Heavily filtered, longer distance views are available from the east. Overall, there is limited cohesion across the site and between the site and the surrounding landscape due to the range of land uses and built form surrounding the site.

### **Green Belt Assessment**

- 2.40 The approach is to undertake the assessment in two stages. First, to assess the site against the Atkins methodology. This will allow for a direct comparison to be made with the much larger RP38. Secondly, to assess the site against the EDP methodology outlined further below. This asks more questions of the site in order to develop a further detailed understanding of the contribution the site makes to the five purposes. The Green Belt Assessment has been undertaken by a Chartered Landscape Architect.
- 2.41 The scoring between the EDP and Atkins methodology is not comparative; the Atkins methodology asks four questions against four of the five purposes resulting in a maximum score of 12 if each purpose was to be strongly met. No contribution is given a score of '0'. The EDP methodology asks eight questions against all five purposes but no contribution is given a score of '1', resulting in a maximum score of 21 if each purpose was to be strongly met. The Atkins methodology does not score sites against their inclusion within the Green

Belt, the reasoning being that all land within their review is within the Green Belt. However, for completeness, the EDP methodology does score sites for their inclusion within the Green Belt.

### **Assessment Criteria**

- 2.42 As noted in the NPPF, paragraph 130 and above, the Green Belt serves five purposes. For each NPPF purpose, criteria have been determined that allows for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose are described in more detail below.

#### *Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas*

- 2.43 This is a test that considers whether any built form is contained within the site or if the site is able to prohibit further development. Commonly this is ribbon development, but may also be piecemeal development in isolated areas or along settlement edges. A site may have already been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness.
- 2.44 Sprawl may also be discouraged by defensible boundaries that are either natural (e.g. topography, woodland, water course) or man-made features such as a road, railway line, or settlement edge. These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries contribute towards greater openness.

#### *Purpose 2: To Prevent Neighbouring Towns Merging into One Another*

- 2.45 The wording of the NPPF refers to 'towns', but in the context of this assessment study area, the Green Belt affects a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges as well as distinct settlement areas which might be defined as towns. In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in either plan view or 'on the ground' by intervening natural or man-made features.
- 2.46 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on the extent of openness between two settlements and each situation needs to be reviewed in relation to the local landscape and visual context.

#### *Purpose 3: To Assist in Safeguarding the Countryside from Encroachment*

- 2.47 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character,

topographical features or open space, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.

- 2.48 This assessment is based on the key landscape characteristics of the site and its surroundings as well as the visual context as described above.
- 2.49 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- 2.50 The matter of 'encroachment' is also a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site which has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 2.51 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways or motorways. Natural features might include woodland, large water bodies such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- 2.52 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

*Purpose 4: To Preserve the Setting and Special Character of Historic Towns*

- 2.53 The subject of setting and special character in the context of historic towns should be examined on a site by site basis, by specialist heritage consultants. However, the conservation area local heritage designation allows the assessment to acknowledge that historic cores exist.

*Purpose 5: to Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land*

- 2.54 The consultation exercise considers sites within the Green Belt as well as the redevelopment of urban land with the presumption in favour of development opportunities outside the Green Belt.

### **Assessment Against Atkins Methodology**

2.55 EDP have assessed the site against the Atkins methodology contained in the Solihull Strategic Green Belt Assessment (July 2016). A summary of the findings are presented below in **Table EDP 2.1**. Cells shaded orange represent a difference in scores using the same Atkins methodology. Where there is a difference, this is briefly explained below the table, whilst the EDP assessment expands on this analysis.

**Table EDP 2.1:** EDP Assessment using Atkins Methodology.

Refined Parcel	Description	Purpose Scores					Highest Score
		1	2	3	4	Total	
RP38	Land to the west of Grand Union Canal, south of B4101 Kenilworth Road.	1	2	3	3	9	3 (Purpose 3 and 4)
EDP Assessment Site	Land east of Warwick Road, Knowle.	1	0	1	0	2	3 (Purpose 1 and 3)

#### *Purpose 2: To Prevent Neighbouring Towns Merging into One Another*

2.56 Using the Atkins methodology, the test is whether or not development of the site would prevent major urban areas/cities from merging. In this context, Coventry lies 8.70km further east, which is beyond the 5km threshold in the Atkins methodology. Moreover, development would not bring the settlement edge of Knowle any closer to Temple Balsall to the east.

#### *Purpose 3: To Assist in Safeguarding the Countryside from Encroachment*

2.57 The site is not considered to be either rural or open. It partially borders countryside to the east but has development present adjoining its northern and eastern boundaries and is further sub-urbanised by the A4141 to the west.

#### *Purpose 4: To Preserve the Setting and Special Character of Historic Towns*

2.58 As demonstrated by **Plan EDP 1**, the site is not within or does not adjoin Knowle Conservation Area.

### **EDP Methodology**

2.59 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.

2.60 The site is scored against the criteria listed for each purpose as shown in **Appendix EDP 2**, with criteria scoring set out in **Table EDP 2.2** below.

**Table EDP 2.2:** Scoring.

Criteria Score	Contribution to the Green Belt Purpose
1	No contribution
2	Limited contribution
3	Strong contribution

2.61 The grading of overall scores reflects the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.

2.62 The findings are presented in the Green Belt Assessment Table in **Appendix EDP 3**.

2.63 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the Green Belt. This is, however, provided as part of the planning statement supporting the information submitted to the LPA.

2.64 The findings demonstrate that, out of a maximum score of 21, which would indicate that a site would be performing a strong role in achieving all Green Belt purposes, and a minimum score of 8, the site scores 13 against the current baseline, which can be described as making a limited contribution. Furthermore, the assessment considers the site in the context of the draft local plan proposals. Scores are shown in red within **Appendix EDP 3** which result in a reduction in contribution to 11.

2.65 A summary discussion of the findings in relation to each of the purposes is provided below.

*Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas*

2.66 This assessment considers how the site and its features contribute towards the openness of the Green Belt and the potential to create a permanent boundary, should it be taken out of the designation. The site comprises predominantly horse pasture, associated structures, temporary structures and hedgerows. The sense of openness is, therefore, already limited to some extent. Development of the site would contribute towards increasing the built form and therefore reduce the sense of openness experienced in views across the site where available. However, that sense of openness has already been eroded.

2.67 The area is delineated by clearly definable boundaries that follow Warwick Road to the west, strong mature field boundaries to the north and east and the built form of the garden centre to the south. Most importantly the southern boundary (defined by Warwick Road) and the western boundary (defined by the garden centre) have an undisputable permanence and defensibility in preventing further development in either direction. The eastern boundary is also delineated in part by buildings which together with the strong

hedgerow boundary create a boundary that is clearly delineated and therefore defensible but could be strengthened with further woodland/tree planting.

*Purpose 2: To Prevent Neighbouring Towns Merging into One Another*

2.68 It is not considered that the land parcel has any function in preventing coalescence. Development would not for example bring the settlement edge of Knowle any closer to Temple Balsall to the east. It seems clear that Knowle and Dorridge has already coalesced.

2.69 It is therefore considered that development of the site will not contribute to 'unrestricted sprawl' or 'the merging of neighbouring towns'.

*Purpose 3: To Assist in Safeguarding the Countryside from Encroachment*

2.70 The site is abutted by existing residential and commercial development to the north-east and south, contained to the west by Warwick Road and to the east by a row of poplar trees and agricultural buildings adjacent to the eastern site boundary. Furthermore, should the mixed development (Arden School and Residential) adjacent to Warwick Road come forward in the manner proposed within the draft local plan (**Appendix EDP 1**) the site would be well associated with the existing settlement edge and could be considered infill.

2.71 In landscape character terms, the site currently has an urban fringe character lying with a fragmented mosaic of built (residential and commercial) and urban fringe (intensive equestrian) land uses. Thus, the site does not have a strong sense of countryside in which to encroach. Furthermore, the site has limited connectivity with the wider open countryside which restricts the potential for any further encroachment.

*Purpose 4: To Preserve the Setting and Special Character of Historic Towns*

2.72 The site is so far removed from the historic centres of any towns or cities in the area that it can have no function in relation to this purpose.

*Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land*

2.73 The site is entirely contained within the Green Belt and does therefore perform positively against this function. However, as demonstrated above, with the identified need for some development within the Green Belt, some development can occur in this location.

2.74 It is considered that the site could reasonably be removed from the Green Belt and developed in accordance with sound masterplanning principles without harm to the integrity of the Green Belt overall.

## Conclusions

- 2.75 This briefing paper has provided an overview of the landscape and visual aspects of the site, which lies within the Green Belt, and provided landscape evidence of the suitability of the site for sustainable development in this regard. The conclusions in respect of these matters is summarised below.
- 2.76 The site contains no designated environmental assets. There is no intervisibility with Knowle Conservation Areas and associated listed buildings. There is the potential for heavily filtered views from Knowle Locks and the Grand Union Canal Walk approximately 800m to the east. Development is also likely to be visible from residential receptors along Kenilworth Road. Consideration should also be given to the Warwick Road approach to Knowle, although the character is already heavily influenced by the garden centre. These receptors will need careful consideration in the masterplan process to ensure a sensitive approach. With appropriate strategies in place development at the site could comply with all relevant policy and guidance at local and national level.
- 2.77 This preliminary landscape and visual appraisal finds that the character of the site is more heavily influenced by the settlement edge than the surrounding countryside. This would be exacerbated if development adjacent to Warwick Road as indicated in the draft local plan were to come forward.
- 2.78 The landscape and visual based assessment of how the site and its features contribute towards the purposes of the Green Belt is summarised below:
- Purpose 1 – the site currently contains some built development and is influenced by various detractors which compromise its openness and give parts of the site a suburban character. The site has clear defensible boundaries on 3 sides, the eastern boundary would benefit from some strengthening;
  - Purpose 2 – development of the site would not bring the settlement of Knowle closer to Temple Balsall and is beyond the threshold for merging with Coventry;
  - Purpose 3 – in landscape character terms, the site currently has a strong semi-urban character with a fragmented mosaic of built, urban fringe, and agricultural land uses, and is influenced by the garden centre to the south. As discussed above should development adjacent to Warwick Road come forward in the manner proposed within the draft local plan the site could be considered infill. Furthermore, considered masterplanning would safeguard any encroachment into the countryside;
  - Purpose 4 – there is no proximity or intervisibility with the historic core of a town and thus the area does not perform against this function; and
  - Purpose 5 – The site is entirely contained within the Green Belt and does therefore perform positively against this function. However, as demonstrated above, with the identified need for some development within the Green Belt, some development can



occur in this location while preventing merging of settlements, encroachment and unrestricted sprawl.

- 2.79 Thus, it is considered that the site could reasonably be removed from the Green Belt and developed in accordance with the sound masterplanning principles without harm to the integrity of the Green Belt overall.

***Updates in the Draft Local Plan***

- 2.80 The Solihull Local Plan – Draft Submission Plan and the Solihull Local Plan Concept Masterplan identifies the adjacent site for potential development and proposes 750 housing units:

- With regards to the site's character and visual context, development south of Knowle would introduce urban characteristics to the west and southern boundary; and
- With regards to purpose 1 and 3 of the Green Belt Assessment, a development to the west and south of the site would bring urban characteristics to the site and result in less exposure to the surrounding open countryside.

- 2.81 The new proposals in the draft local plan would help support the conclusions made in within this report.

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## Section 3 Ecology

- 3.1 This preliminary ecological statement has been informed by a desk-based assessment using web-based environmental records, aerial mapping and planning policy information.

### Preliminary Ecological Baseline

#### Designated Sites

- 3.2 Statutory designations represent the most significant ecological receptors, being of recognised importance at an international and/or national level. Statutory designations of International/European value include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. Statutory designations of national value include SSSIs and National Nature Reserves (NNRs). Local Nature Reserves (LNRs) are also statutory, with their level of value typically considered at county level or less.
- 3.3 The site itself is not covered by any statutory designations, however, three SSSIs and two LNRs occur within the site's potential Zol<sup>1</sup>.

**Table EDP 3.1:** Statutory Sites of Nature Conservation Importance within the site's Potential Zol.

Site Name	Size (ha)	Approx. Distance from Site	Interest Feature(s)
<b>SSSIs</b>			
Brook Meadow	1.8	1.4km S	Of special interest for a type of herb-rich flood meadow grassland characterised by meadow foxtail ( <i>Alopecurus pratensis</i> ) and great burnet ( <i>Sanguisorba officinalis</i> ), which is now very scarce nationally and in the county.
River Blythe	39km	1.6km E 2.7km W	River with a wide range of natural structural features and substrate types. The structure is very variable and its importance is increased because of the rarity of such examples in lowland Britain. The diverse physical features of the Blythe are mirrored by its diverse plant communities. The mean number of plant species found in any 1km stretch is above average for a lowland river, as is the number of species recorded for the whole length of the river.
Monkspath Meadow	1.0	3.5km W	The best example of a species-rich, unimproved hay meadow in the West Midlands County.

<sup>1</sup> Zone of Influence - the areas and resources that may be affected by the proposed development. Set at 10km for international designations, 5km for nation designations and 2km for local designations

Site Name	Size (ha)	Approx. Distance from Site	Interest Feature(s)
<b>LNR</b>			
Jobs Close	3.4 (LNR) 8.2 (Woodland Trust)	900m N	A Woodland Trust run woodland.
Dorridge Wood	7.5 (LNR) 5.2 (Woodland Trust)	1.6km SW	A Woodland Trust run woodland and Green Flag Park.

- 3.4 There is no direct terrestrial or hydrological connectivity between these designated sites and the site. In addition, the site does not fall into an Impact Risk Zone<sup>2</sup> for which residential developments are required to consult with Natural England as to their impacts on any SSSIs. Whilst there may be an increase in recreational impact on the two LNRs as a result of development at the site, both of these LNRs are well managed for visitors and recreation is encouraged. As such any increase in recreational pressure arising from the proposed development of the site is unlikely to result in any significant harm to these LNRs.
- 3.5 No information has been obtained on non-statutory designations at this stage, however, mapping within the Solihull Nature Conservation Strategy (2010 – 2014) shows there are three Local Wildlife Sites and one potential Local Wildlife Site within the potential Zol.

### Habitats

- 3.6 Using aerial imagery, the site appears to consist of three main field parcels of semi-improved grassland with tall ruderal vegetation bounded by hedgerows with trees. A field drain runs along the southern edge of the northern field parcel and turns south to run along the eastern edge of the southern field parcel. Two buildings are present within the southern field parcel.

### Protected and Notable Species

- 3.7 Limited information or records of protected and notable species has been gathered at this stage however, based on the nature of the habitats likely to be present within the site, and the immediate surroundings, there is potential to support the following assemblages of protected and notable (species considered to be locally rare or listed as being of conservation concern at a local or national level) species.

<sup>2</sup> The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

### **Birds**

- 3.8 There is the potential for a small number of breeding birds associated with open fields and farmland to be present, in addition, the hedgerows and mature trees (and potentially the buildings) within the site are likely to support birds associated with these habitats.

### **Bats**

- 3.9 The hedgerows within the site, and to a lesser extent the pasture fields, are likely to provide foraging and commuting habitat for bats. The adjacent offsite habitats including the canal and existing hedgerow network are also likely to provide a commuting route and foraging habitat for bats within the wider landscape.
- 3.10 The mature trees within, and on the boundaries of, the site and the buildings within the southern field parcel may also potentially support roosting bats. There are licences granted nearby for common (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*), natterers bat (*Myotis nattereri*), Brandt's bat (*Myotis brandti*), whiskered bat (*Myotis mystacinus*) and brown long-eared bat (*Plecotus auritus*).

### **Amphibians**

- 3.11 An overview of Ordnance Survey (OS) mapping shows that there are two ponds in an area of woodland to the north and a pond linked to the field drain to the south of the site. These ponds are not separated from the site by anything that would be a significant barrier to dispersal of amphibian species such as great crested newt (*Tritus cristatus*) and common toad (*Bufo bufo*). Great crested newts, and their breeding/resting places, are fully protected under UK and EU law. In addition, both of these species are local biodiversity action plan (LBAP) species<sup>3</sup> and the habitats on-site are likely to provide suitable terrestrial habitat for them. However, the site does not appear to offer habitat of a higher suitability than that immediately surrounding the potential ponds.

### **Reptiles**

- 3.12 There is some (albeit low) potential for the grassland within the site to support reptiles and grass snake (*Natrix natrix*), slow worm (*Anguis fragilis*) and common lizard (*Zootoca vivipara*) are all LBAP species<sup>3</sup>.

### **Badgers and Other Notable Mammals**

- 3.13 The hedgerows within the site do potentially provide suitable sett building habitat for badgers (*Meles meles*) and breeding habitat for hedgehogs (*Erinaceus europaeus*) and the areas of grassland potentially provide suitable foraging habitat for badgers, hedgehogs and brown hare (*Lepus europaeus*).

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<sup>3</sup> Solihull Metropolitan Borough Council, Solihull Nature Conservation Strategy 2010 - 2014

### **Water Voles and Otters**

- 3.14 The field drain that runs through and adjacent to the Site looks to be heavily shaded and unsuitable for water voles (*Arvicola amphibious*) which typically require unshaded banks which support a range of grass and rush species. However, the entire length of this drain could not be assessed from aerial imagery. The drain is highly unlikely to support fish and so will be highly unlikely to be suitable for otter (*Lutra lutra*).

### **Key Constraints and Opportunities**

- 3.15 On the basis of this initial desk-based assessment, it is considered that there are likely to be no 'in principle' constraints to development of the site. However, impacts on some potentially valuable habitats and protected species pose some limited constraints to any development and will need further consideration and possible mitigation as discussed below.
- 3.16 The likely key constraints (to be confirmed through appropriate survey and further desk-based assessment) associated with the site are as follows:
- The presence of non-statutory sites with potential connectivity to the site via the hedgerows or field drain;
  - Ecologically valuable trees, hedgerows and field drain which form ecological corridors to the wider area; and
  - Protected species whose presence will need to be confirmed through specific 'Phase 2' surveys (scope to be agreed via consultation with the LPA), may potentially include great crested newts, breeding birds, bats (roosting and foraging), reptiles, water voles, hedgehogs and badgers.
- 3.17 It is considered that the majority of impacts on habitats and protected species (if present) can be avoided/mitigated/compensated for through the retention and enhancement of key features within the site as per the following:
- Retention/buffering, where possible, of the on-site habitats and immediately adjacent semi-natural habitats, in particular the hedgerows and field drain;
  - Enhancement of existing hedgerow network, where retained, through selective 'gap' planting with native hedgerow species of local provenance and long-term management for the benefit of wildlife;
  - Creation of areas of species-rich wildflower grassland within any areas of retained informal green open space;
  - Incorporation of a range of bat and bird boxes on retained trees and/or new buildings to provide new roosting and nesting opportunities;

- Wildlife-sensitive lighting scheme to minimise the effects of artificial lighting on commuting and foraging bats and other nocturnal wildlife; and
- Provision of Sustainable urban Drainage Systems (SuDS) features designed to benefit biodiversity through appropriate design, planting and management of surrounding green open spaces.

3.18 It is considered that the habitat creation and enhancement recommendations mentioned previously would provide a net gain in biodiversity in line with the objectives of local and national planning policy.

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## Section 4 Heritage

- 4.1 This preliminary heritage statement has been informed by a desk-based appraisal using web-based records and information on the LPA's website.

### Designated Heritage Assets

- 4.2 The site does not include any designated heritage assets, as defined in Annex 2 of the NPPF, where there would be a presumption in favour of their retention.
- 4.3 The closest such asset is the Grade II listed Rotton Row Farmhouse (List ID: 1342881), which lies c.400m to the south. This comprises a late 18<sup>th</sup>/early 19<sup>th</sup> century redbrick farmhouse with hipped roof and central door with surrounding fanlight, slim Doric pilasters and entablatures. This building predominantly draws its significance from its historic and architectural interest as a post-medieval dwelling, reflecting the stylistic tastes and practical requirements of its time. There is some limited artistic interest in its few embellishments, but no known archaeological interest.
- 4.4 The associated farm buildings arranged around a former farmyard, are located immediately to the north of the farmhouse, albeit they are converted to non-agricultural uses. The listed building is otherwise tightly contained within its private gardens with well-vegetated boundaries. These elements of its setting are considered to contribute to its significance, due to historic and functional links. It is physically and visually segregated from many parts of the surrounding farmland by the vegetated and built environment, and therefore it draws a limited amount of significance from immediately surrounding fields.
- 4.5 By comparison, the site is distant and there are no known historic functional or visual connections between it and the farm. Therefore, it appears unlikely that the development of the site would have any affect on its setting, such that could harm its significance.
- 4.6 The Knowle Conservation Area lies c.420m to the north of the site, at its closest. The Council's adopted Conservation Area Appraisal (hereafter referred to as the 'Appraisal'; SMBC 2007) states that its designation was intended to preserve the historic core of the settlement. The Appraisal describes the conservation area's key positive characteristics, including its diverse range of plot widths and building types (which reflects its historic development), the consistency of building materials, the focus on the parish church and The Square, and the significant groups of listed and locally listed buildings. This leaves little doubt that its 'special interest' is mainly derived from its constituent built form.
- 4.7 The Appraisal also states that the 'significance' as an "*agricultural settlement serving a rural hinterland*" is a key positive characteristic, albeit it also recognises the effect of post-war housing expansion that has surrounded the conservation area in modern housing in many areas. The historic link to the immediately surrounding farmland is most readily experienced in views outward from the conservation area, as discussed further below.

- 4.8 In terms of views, the Appraisal notes the importance of local landmarks within the conservation area, particularly the church, and underlines the inward focus of many such visual connections. Whilst views into the countryside are recognised in the Appraisal, none of the identified 'significant' views are focussed toward or across the site. Indeed, given the intervening topography and built and planted environment, it seems unlikely that there are any views to the site.
- 4.9 In conclusion with regard to the conservation area, it is considered unlikely that a suitably proportioned and sympathetic development of the site would lead to any harm to the 'special interest' of the conservation area.
- 4.10 Otherwise, the remaining designated heritage assets in the wider area, the majority of which comprise listed buildings contained within the Knowle Conservation Area, where their setting is focussed on the constituent streetscenes and property plots, are also unlikely to experience change to their setting such that could result in harm to their significance.

#### **Non-designated Heritage Assets**

- 4.11 A review of online sources for archaeological information, such as the Archaeological Data Service and the results of desk-based assessments for nearby planning applications, has not identified any previously known buried remains within the site.
- 4.12 Historic cartographic sources were consulted to inform this statement. The earliest reviewed map was the Knowle Tithe Map of 1841, which shows the site as a single meadow named 'Hancox's Meadow'. Thereafter, OS Maps from 1888 to 1987 shows a continuation of this usage into the present.
- 4.13 Whilst it is recognised that in due course a full archaeological assessment will be required to support any future planning application, based on the current evidence there is no indication that the site would contain significant archaeological remains.

## **Section 5 Conclusion**

- 5.1 Spitfire Bespoke Homes Ltd appointed EDP to undertake landscape, ecology and heritage studies in relation to Warwick Road, Knowle.

### **Landscape**

- 5.2 This preliminary landscape and visual appraisal finds that the character of the site is more heavily influenced by the settlement edge than the surrounding countryside. This would be exacerbated if development adjacent to Warwick Road as indicated in the draft local plan were to come forward.
- 5.3 The site could reasonably be removed from the Green Belt and developed in accordance with the sound masterplanning principles without harm to the integrity of the Green Belt overall.

### **Ecology**

- 5.4 This briefing note provides an initial high-level assessment of the site with respect to identifying key ecological constraints and opportunities to inform a wider assessment of its potential to support future residential development. The desk-based assessment has identified the following potentially valuable ecological features within and adjacent to the site:
- The presence of non-statutory sites with potential connectivity to the site via the hedgerows or field drain;
  - Ecologically valuable trees, hedgerows and field drain which form ecological corridors to the wider area; and
  - Protected species whose presence will need to be confirmed through specific 'Phase 2' surveys (scope to be agreed via consultation with the LPA), may potentially include great crested newts, breeding birds, bats (roosting and foraging) water voles, hedgehogs and badgers.
- 5.5 However, there are no obvious 'in principle' (significant) ecological constraints that would preclude development, and which cannot be avoided by good design.

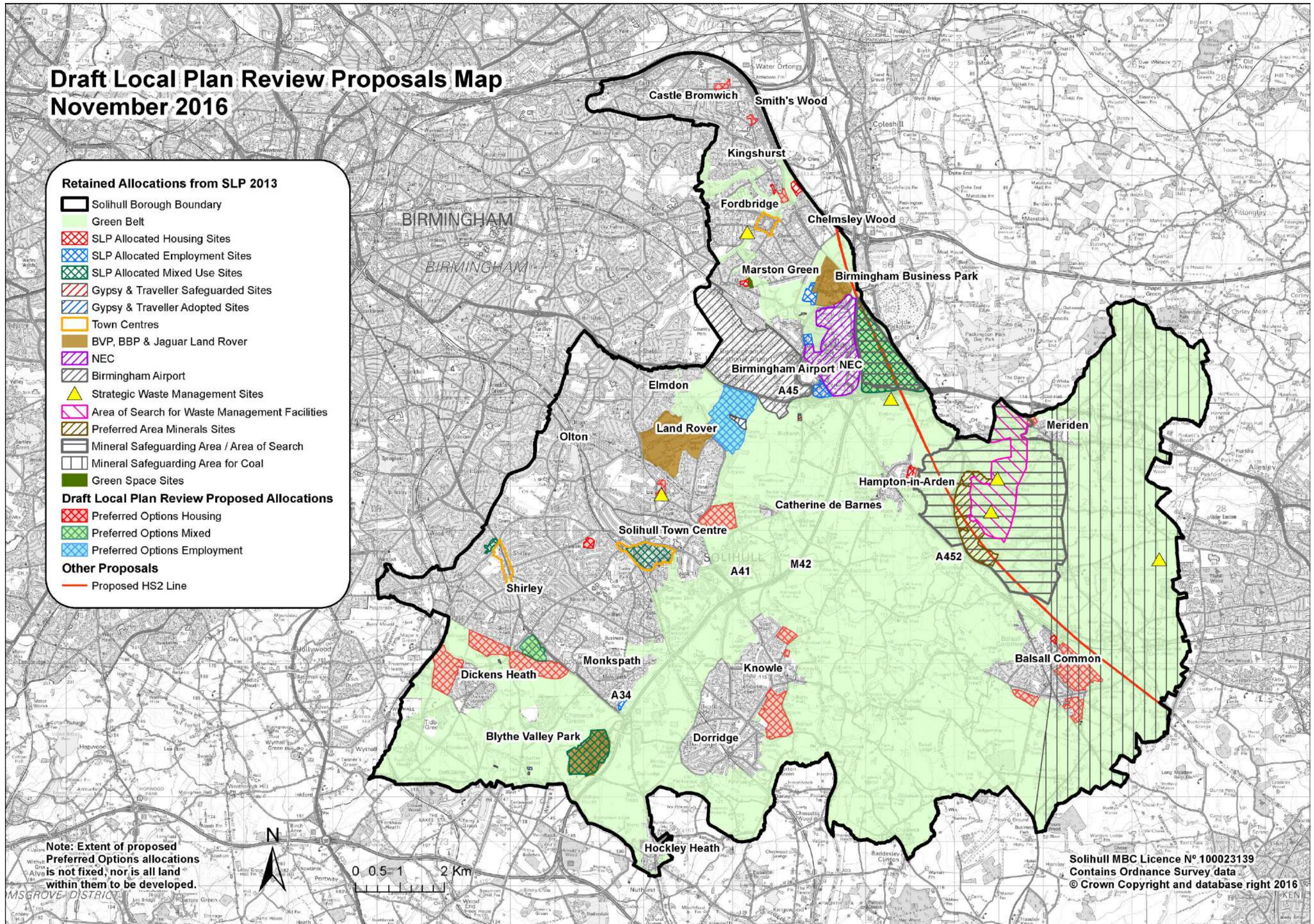
## **Heritage**

- 5.6 The development of the site is unlikely to result in harm to any designated heritage assets in the surrounding area, and they are therefore considered unlikely to influence future residential proposals. Based on current evidence, it also appears unlikely that the site contains archaeological remains of such significance and extent as to form a constraint to development. Therefore, in terms of heritage, there is no current reason to believe that there are any constraints to the development of the site, such that could influence its deliverability or capacity.

**Appendix EDP 1**  
**Draft Local Plan Proposals Map**

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**D. Proposals Map**



## Appendix EDP 2

### Assessment Methodology and Criteria

NPPF Paragraph 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
<p><b>Purpose 1</b>  <b>To check the unrestricted sprawl of large built-up areas</b></p>	<p>Creates a clear, recognisable distinction between urban fringe and open countryside.</p>	<p>Does the site form a contiguous open buffer between the existing settlement edge and the wider countryside?</p> <ul style="list-style-type: none"> <li>a. Yes, the site is free of development and associated influences and strongly contributes to the openness of the Green Belt (score: 3);</li> <li>b. There is an absence of development within the site but it is overlooked by adjacent/nearby development (score: 2); and</li> <li>c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (score: 1).</li> </ul>
	<p>Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary. Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows and streams. Fences do not form defensible boundaries.</p>	<p>Does the site have a defensible boundary which can prevent sprawl?</p> <ul style="list-style-type: none"> <li>a. The site does not have a defensible boundary and therefore openness is greater (score: 3);</li> <li>b. The site has a defensible boundary/-boundaries, which would need additional reinforcement (score: 2); and</li> <li>c. The site has a defensible boundary/-boundaries, which do not require additional reinforcement (score: 1).</li> </ul>



NPPF Paragraph 134 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Score
<p><b>Purpose 2</b> <b>To prevent neighbouring towns merging into one another</b></p>	<p>Settlements maintain a clear and sinuous edge.</p>	<p>Is the site well associated with the existing settlement edge?</p> <ul style="list-style-type: none"> <li>a. The site is isolated from the settlement boundary and appears divorced from it (score: 3);</li> <li>b. The site abuts one settlement boundary but is not divorced from it (score: 2); and</li> <li>c. The site abuts two or more settlement boundaries and therefore forms part of an indent (score: 1).</li> </ul>
	<p>Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap.</p> <p>The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging.</p>	<p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?</p> <ul style="list-style-type: none"> <li>a. Immediate and clear intervisibility with next nearest settlement edge (score: 3);</li> <li>b. Partial visual association with next nearest settlement edges (score: 2); and</li> <li>c. Limited or no visual association with next nearest settlement edges (score: 1).</li> </ul>
<p><b>Purpose 3</b> <b>To assist in safeguarding the countryside from encroachment</b></p>	<p>The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.</p>	<p>To what extent does the site represent the key characteristics of the countryside?</p> <ul style="list-style-type: none"> <li>a. The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics. (score: 3);</li> <li>b. The site comprises some representative key characteristics but there are few connections with off-site characteristics (score: 2); and</li> <li>c. The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics (score: 1).</li> </ul>

<b>NPPF          Paragraph 134          Green Belt          Purpose</b>	<b>Criteria</b>	<b>Application of Criteria to Site and Criteria Score</b>
	Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.	To what extent is the site urbanised, either by on-site or off-site features?  a. There are no urbanising features within the site or directly influencing it (score: 3); b. There are several urbanising features affecting the site (score: 2); and c. There are many urbanising features affecting the site, which reduces its representativeness of the countryside (score: 1).
<b><u>Purpose 4</u>          To preserve the setting and special character of historic towns</b>	In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to the historic core of a town.	What is the spatial and visual relationship between the site and the historic core of the nearest towns?  a. The site shares a boundary with the historic core of the town, is partially or wholly within it or has clear intervisibility with the historic core (score: 2); and b. The site does not share a boundary with the town and/or there is no intervisibility with its historic core (score: 1).
<b><u>Purpose 5</u>          To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	By association with the Green Belt designation, would assist in urban regeneration by directing development away from it.	a. The site is in the Green Belt (score: 2); and b. The site is not in the Green Belt (score: 1).

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## Appendix EDP 3 Green Belt Analysis

NPPF Paragraph 134 Green Belt Test	Application of Criteria	Assessment	Criteria Score
<p><b>Purpose 1: To check the unrestricted sprawl of large built-up areas</b></p>	<p>Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/wider countryside?</p>	<p>The site contains a mixture of land uses typical of the urban fringe. The garden centre to the south and Warwick Road to the west reduces the perceptual and physical connectivity to the wider countryside.</p>	<p><b>2</b> 2</p>
	<p>Are there any defensible boundaries?</p>	<p>The site boundary follows strong defensible features such as roads, hedge lines and existing built form, it is likely that short sections of boundary reinforcement could be carried out to assimilate the development within its setting. Defensible boundaries are defined as follows: Warwick Road to the west; strong mature field boundaries to the north and east; and the built form of the garden centre to the south. Most importantly the southern (defined by Warwick Road) and the western boundary (defined by the garden centre) have an undisputable permanence and defensibility in preventing further development in either direction.</p>	<p>1 1</p>
<p><b>Purpose 2: To prevent neighbouring towns merging into one another</b></p>	<p>Is the site well-associated with the existing settlement edge?</p>	<p>The site lies adjacent to the eastern settlement edge of Knowle and would make a logical extension of the settlement, given the garden centre to the south. Should the development proposals adjacent to Warwick Road come forward in the manner indicated within the draft local plan, the site would be surrounded by development on all sides.</p>	<p>2 1</p>
	<p>What is the intervisibility with the next nearest settlement edge?</p>	<p>The site is subject to visual containment and is not visible from either Dorridge or Temple Balsall.</p>	<p>1 1</p>

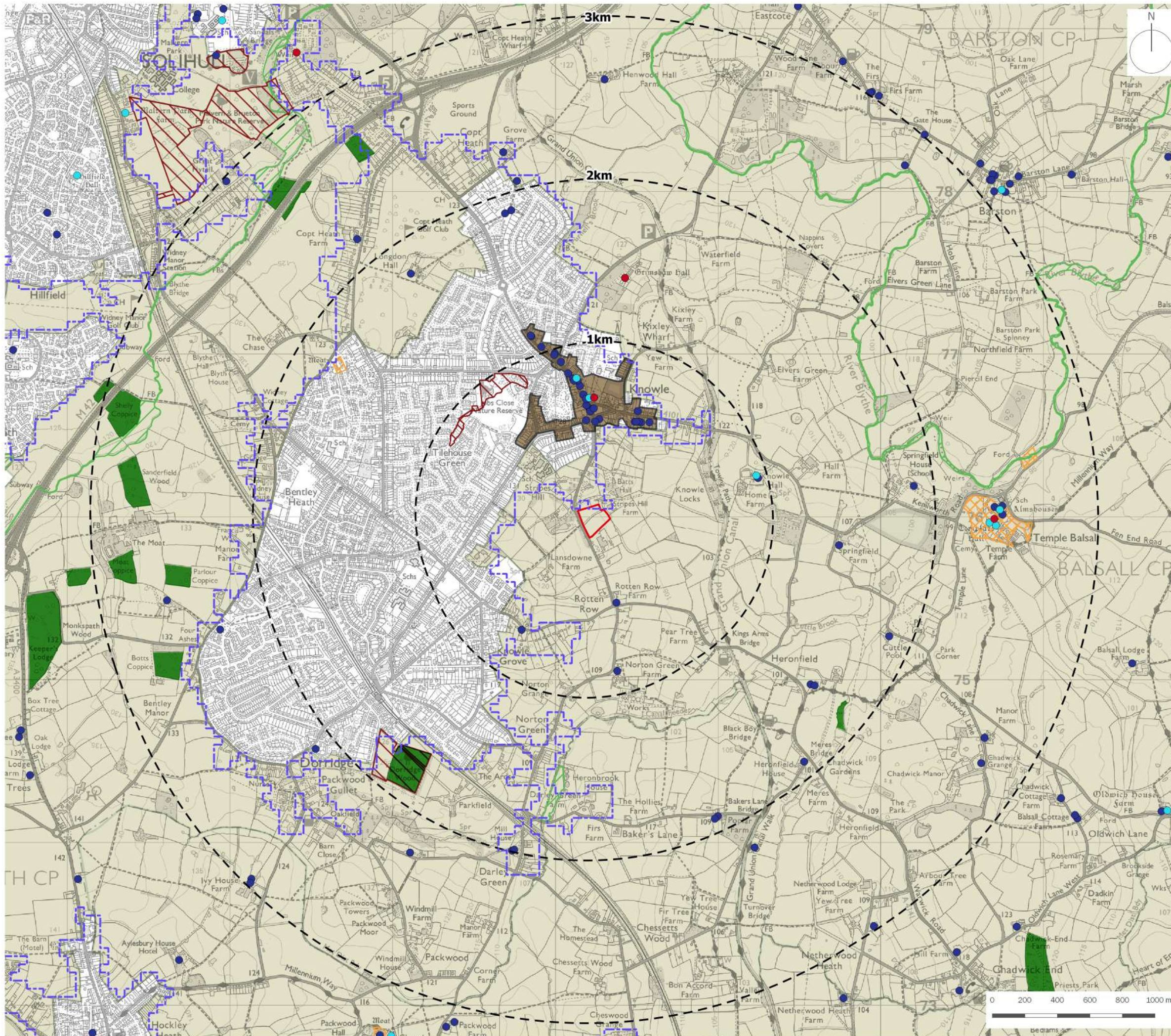
NPPF Paragraph 134 Green Belt Test	Application of Criteria	Assessment	Criteria Score
<p><b>Purpose 3: To assist in safeguarding the countryside from encroachment</b></p>	<p>How representative is the site of the key characteristics of the countryside?</p>	<p>The site currently has a suburban character with urban fringe land uses. It is also subject to urban influences from the adjacent garden centre and Warwick Road. There is also some deterioration of landscape fabric due to intensive equestrian activity and a lack management.</p>	<p>2 2</p>
	<p>What is the influence of urbanising features?</p>	<p>The influence of urbanising features can be seen across the site. The current land use and associated temporary structures (horse shelters and static caravan) detract from any perception of rural countryside character. The garden centre along the southern boundary has a strong urbanising effect with the visual, perceptual and sensory influence of, traffic, signage, lighting and noise. Warwick Road to the west is audible and visually legible. Should the adjacent development come forward in the manner proposed in the draft local plan this would have an additional urbanising influence on the site. As it stands the site is already physically and visually separated from the wider open countryside to the east and south-east.</p>	<p>2 1</p>
<p><b>Purpose 4: To preserve the setting and special character of historic towns</b></p>	<p>What is the nature of the spatial and visual relationship between the site and the historic core of the nearest town?</p>	<p>There is no proximity or intervisibility with the historic core of a town and thus the site does not perform against this function.</p>	<p>1 1</p>
<p><b>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b></p>	<p>Is the land within the Green Belt?</p>	<p>The site is entirely within the Green Belt.</p>	<p>2 2</p>
<p><i>The criteria scores in red assume development to the east of Warwick Road as indicated in the draft local plan (Appendix EDP 3)</i></p>			<p>13 11</p>

## **Plans**

**Plan EDP 1** Environmental Planning Context  
(edp3776\_d002b 14 December 2020 AL/WG)

**Plan EDP 2** Landscape Character and Context  
(edp3776\_d001b 14 December 2020 AL/WG)

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- Site Boundary
- Range Rings (at 1km intervals)
- Built up Areas 2011 (Office for National Statistics)
- Landscape**
- Green Belt
- Ancient Woodland
- Ecology**
- Site of Special Scientific Interest
- Local Nature Reserve
- Heritage**
- Conservation Area
- Scheduled Monument
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building

client  
**Spitfire Bespoke Homes Ltd**

project title  
**Warwick Road, Knowle**

drawing title  
**Plan EDP 1: Environmental Planning Context**

date	14 DECEMBER 2020	drawn by	AL
drawing number	edp3776_d002b	checked	WG
scale	Refer to scale bar	QA	JTF







- Site Boundary
- Linear Tree Belt
- Woodland Copse
- Public Right of Way
- Grand Union Canal
- Key Views
- Proposed Housing Allocations  
(Draft Local Plan, November 2016)

client  
**Spitfire Bespoke Homes Ltd**

project title  
**Warwick Road, Knowle**

drawing title  
**Plan EDP 2: Landscape Character and Context**

date 14 DECEMBER 2020 drawn by AL  
drawing number edp3776\_d001b checked WG  
scale Refer to scale bar QA JTF



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# SOLIHULL BOROUGH HOUSING NEED REPORT

*Prepared on behalf of:*

Barratt David Wilson Homes

Spitfire Bespoke Homes

IM Land

Heyford Developments

Generator Strategic Land

December 2020

# SOLIHULL BOROUGH HOUSING NEED REPORT

December 2020

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## 1.0 INTRODUCTION

- 1.1 This Report has been prepared by Barton Willmore's National Development Economics Team on behalf of Barratt David Wilson Homes, Spitfire Bespoke Homes, IM Land, Heyford Developments, and Generator Strategic Land, in response to Solihull Borough Council's (SBC) consultation on its Local Plan – Draft Submission Plan (October 2020).
- 1.2 Specifically, this Report focuses on the calculation of housing need in the Draft Plan, and whether this aligns with the National Planning Policy Framework (NPPF, 2019), the Planning Practice Guidance (PPG, 2019), and the aims, objectives, and policies of the Draft Plan.
- 1.3 In undertaking this analysis, the Report reviews recent housing and employment evidence base documents published by SBC, alongside other publicly available data.
- 1.4 The Report provides the national and local planning policy context for determining housing need in Solihull, before reviewing the Council's housing need evidence base. We then present sensitivity testing of the Council's conclusions on what should constitute economic-led housing need, and what should inform the housing requirement of the Draft Plan.
- 1.5 We also consider the unmet housing need in the wider Greater Birmingham and Black Country Housing Market Area (GBBC HMA) following the publication of the 'Housing Need and Housing Land Supply Position Statement' (Position Statement, July 2020).





## 2.0 NATIONAL PLANNING POLICY CONTEXT

### i) Introduction

- 2.1 The National Planning Policy Framework (NPPF) was revised initially in July 2018 and again in February 2019. In respect of housing need, and how this is calculated for each local authority, the revised NPPF introduced the 'Standard Method' (SM) for calculating local housing need. This replaced the previous 'Objective Assessment of Overall Housing Need' (OAN) immediately in respect of planning applications and appeals.
- 2.2 However, in respect of the examination of Local Plans, a transition period applied for 6 months, during which time all Plans submitted to the Secretary of State for examination on or before 24 January 2019 were to be subject to the OAN method.
- 2.3 Notwithstanding the introduction of the SM however, there remains uncertainty over the method as of December 2020. This is because the Government's recent 'Changes to the current planning system' proposes a revised Standard Method.

### ii) National Planning Policy Framework (NPPF, 2019)

- 2.4 The revised NPPF replaces the 2012 NPPF and its requirement for an OAN, replacing it with the SM from the 24 July 2019 (except for Local Plans submitted on or before 24 January 2019).
- 2.5 Paragraph 8 of the NPPF lists the three overarching objectives of the NPPF; **economic, social, and environmental**. The social objective states that planning will "*support strong, vibrant and healthy communities, by ensuring that a **sufficient number** and range of homes can be provided to meet the needs of present and future generations.*"
- 2.6 Paragraph 11 moves on to state how "*Plans and decisions should apply a **presumption** in favour of sustainable development*" and how in respect of Plan-making this means that "*plans should **positively seek** opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*" and "*strategic policies should, as a **minimum**, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.*"

- 2.7 Under section 3. 'Plan-making', the revised NPPF states that local authorities *"are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries"* (paragraph 24) and in doing so *"should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these"* (paragraph 27).
- 2.8 When examining Plans and determining whether they are 'sound', the Planning Inspectorate will test whether the Plan is *"**positively prepared** – providing a strategy which, as a **minimum**, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that **unmet need** from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development"* (paragraph 35a).
- 2.9 The NPPF moves on to discuss 'Delivering a sufficient supply of homes' in section 5 and states how the delivery should *"support the Government's objective of **significantly boosting** the supply of homes."* Paragraph 60 moves on to state how *"To determine the **minimum** number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, **any needs that cannot be met within neighbouring areas** should also be taken into account in establishing the amount of housing to be planned for. This identifies how the SM should be used to establish the **minimum** number of homes to be planned for.*
- 2.10 Section 6 of the revised NPPF refers to 'Building a strong, competitive economy' and Paragraph 80 states how *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight** should be placed on the need to **support economic growth** and productivity, taking into account both local business needs and wider opportunities for development."* As part of this the NPPF (paragraph 81c) states how planning policies should *"seek to address potential **barriers** to investment, such as inadequate infrastructure, services or **housing**, or a poor environment."*
- 2.11 In this context, although the NPPF confirms that the SM should be used when calculating housing need, it also confirms how the SM represents **minimum** housing need. The NPPF is also clear that inadequate housing should not create a barrier to investment and that significant weight should be placed on the need to support economic growth.

### iii) Planning Practice Guidance – Housing and Economic Needs Assessment (PPG, 2019)

- 2.12 The 'Housing and Economic Development Needs Assessment' (HEDNA) section of the PPG which supported the 2012 NPPF was initially replaced by the 'Housing Needs Assessment' (HNA) PPG on 13 September 2018 and updated on 20 February 2019. The HNA PPG provides more detailed guidance on the SM introduced in the revised NPPF.
- 2.13 At the outset, it is important to emphasise how the standard method calculation represents **minimum** housing need for an area. The revised HNA PPG is very clear in this respect, paragraph ID2a-002 stating that *"The standard method set out below identifies a **minimum** annual housing need figure. It **does not** produce a housing requirement."*
- 2.14 In this context paragraph ID2a-010 states *"The government is committed to ensuring that more homes are built and **supports ambitious authorities** who want to plan for growth. The standard method for assessing local housing need provides a **minimum starting point** in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether **actual housing need** is higher than the standard method indicates."*
- 2.15 Paragraph ID2a-010 moves on to consider the circumstances where housing *need* in excess of the minimum standard method *need* might be appropriate. Paragraph ID2a-010 states that *"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*
- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
  - *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
  - *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will*

*need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.*

2.16 In summary, in the context of paragraphs ID2a-002 and ID2a-010, it is imperative to understand that the standard method calculation is specifically a **minimum starting point** in determining the number of homes needed, actual need has the potential to be higher in order to support the policies of the NPPF and the clear objectives of Government to 'significantly boost' housing supply and 'support economic growth'.

#### **iv) Status of the Standard Method (December 2020)**

2.17 As of December 2020 the Standard Method set out in the 2019 NPPF/PPG remains the method by which local authorities must determine their minimum housing need.

2.18 However the Government's 'Planning for the Future' and 'Change to the current planning system' consultation, published in August 2020, proposes a change to how the Standard Method calculation is undertaken.

2.19 At the time of writing these changes have been consulted on, and the results of that consultation are not yet known. However, nationally it would result in a starting position of 337,000 dwellings per annum. This is a significant increase to the existing Standard Method (circa 270,000 dwellings per annum).

2.20 Adoption of the proposed changes to the Standard method will have significant consequences for Solihull and the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) as we discuss later in this Report.

#### **v) Summary**

2.21 The current national policy and guidance with respect to housing need has been summarised in this section. The key points to note are:

- the 2019 NPPF introduced the 'Standard Method' for calculating local housing need;
- the Standard Method replaced the OAN method immediately from 24 July 2018 for applications, and for all Local Plans submitted after 24 January 2019;

- Government have reiterated that the SM represents 'minimum' housing need, and it should represent the 'starting point' for planning;
- PPG confirms that 'actual housing need may be higher' than the SM minimum;
- Revised NPPF states how inadequate housing should not form a barrier to investment;
- Proposed revisions to the Standard Method would increase housing need in the GBBCHMA and across the country significantly.



## 3.0 LOCAL PLANNING POLICY

### i) Introduction

3.1 Having identified the existing national policy and supporting guidance in which housing need should be calculated, in this section we consider policy and evidence at the local level in Solihull. This incorporates a summary and review of the Council's October 2020 'Draft Submission Plan' (Draft Plan) and existing policies.

3.2 This will enable the determination of a background from which to establish whether the standard method calculation – minimum housing need – will support policies in the Draft Plan, and whether the Council's own evidence points to 'actual' housing need being higher than the standard method.

### ii) Adopted Solihull District Plan (03 December 2013)

3.3 Before we consider the Draft Plan consultation document, the key policies of the adopted Plan should be summarised.

3.4 Policy P5: 'Provision of Land for Housing' of the adopted Plan targeted the provision of 11,000 dwellings between 2006 and 2028 (500 dwellings per annum). This reflected the requirement recommended by the West Midlands Regional Spatial Strategy Phase II Revision Panel Report which objectively assessed housing need.<sup>1</sup>

3.5 However a successful High Court Challenge was subsequently made in 2014 against Policy P5 and the supporting text set out above in respect of housing numbers. The Judgment against the Council was subsequently upheld at appeal although it was confirmed that all other parts of the Plan remained adopted.

3.6 Notwithstanding the challenge in respect of housing need, the Local Plan is very clear in respect of its responsibilities in respect of economic growth. Challenge D of the Plan is entitled 'Securing Sustainable Economic Growth' and lists the following 'key economic assets' of the Borough:

- i. Maintaining Solihull's important **regional and sub-regional role;**

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<sup>1</sup> Paragraph 8.4.1, page 73, Solihull Local Plan – Shaping a Sustainable Future, December 2013

- ii. Meeting aspirations of key businesses to enable them to **maintain competitiveness** (Birmingham Airport, National Exhibition Centre, Birmingham Business Park, Blythe Valley Park, Jaguar Land Rover) whilst contributing to sustainable development;
- iii. Retaining a **high skilled workforce**;
- iv. Impact of congestion on motorways, the strategic highway network and rail from additional growth/housing;
- v. Impact of pressure for development on the quality of the environment;
- vi. Need to provide opportunities around workplaces for healthy and active lifestyles;
- vii. Need for high speed digital connectivity to enhance competitiveness.<sup>2</sup>

3.7 The 'Vision' for the Borough also states the following:

**"It will be a Borough that continues to be economically successful and a driver for sustainable growth within the West Midlands; where the potential for managed growth within the M42 Economic Gateway is unlocked and the ambitions for the economic assets contained within it are fully realised."**<sup>3</sup>

3.8 The Plan also identifies its place within the Greater Birmingham and Solihull Enterprise Partnership (LEP) stating how *"the Borough is the principal gateway to the Greater Birmingham and Solihull Local Enterprise Partnership area and the wider West Midlands Region"*<sup>4</sup> and how the M42 Economic Gateway sits within the LEP area.

3.9 The Plan goes on to identify how the Borough is home to several economic assets within the M42 Gateway including Birmingham Airport, the National Exhibition Centre, Birmingham and Blythe Valley Business Parks, Jaguar Land Rover and Solihull Town Centre and how *"It is estimated that realising the full potential of the Gateway could create over 36,000 additional jobs by 2026 and add £5.9bn to the West Midlands economy."*<sup>5</sup>

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<sup>2</sup> Key Challenge D – Securing Sustainable Economic Growth, page 20, Solihull Local Plan – Shaping a Sustainable Future, December 2013

<sup>3</sup> Paragraph , page 20, Solihull Local Plan – Shaping a Sustainable Future, December 2013

<sup>4</sup> Paragraph 2.2.1, page 9, Solihull Local Plan – Shaping a Sustainable Future, December 2013

<sup>5</sup> Paragraph 2.7.1, page 14, Solihull Local Plan – Shaping a Sustainable Future, December 2013



**iii) Solihull Local Plan – Draft Submission Plan (October 2020)**

3.10 The Draft Plan outlines at the outset why a review of the adopted Solihull Local Plan is required. The Draft Plan states the following:

**“The current local plan, the “Solihull Local Plan” (SLP), was adopted in December 2013 and covers the period 2011 to 2028. Although it is a recently adopted plan, and is up-to-date in many respects, there are three reasons that have triggered the need for an early review of it. The first is to deal with the legal challenge to the 2013 plan; secondly to accommodate Solihull’s own housing needs, as well as helping to address the housing shortfall occurring in the wider Housing Market Area (HMA); and finally to provide a proper planning framework that recognises the arrival of HS2 in the Borough – in particular the first station outside of London which is to be constructed on land opposite the NEC.”<sup>6</sup>**

3.11 The Draft Plan lists several ‘Challenges’ that the Borough faces. From these challenges several objectives have been formulated. Those challenges relevant to this Housing Need Technical Report are as follows:

- **Challenge B: Meeting housing needs across the Borough, including the Borough’s own needs and, where possible, assisting with accommodating the HMA (Housing Market Area) wide shortfall.**
- **Challenge D: Securing sustainable economic growth;**
- **Challenge M: Maximising the economic and social benefits of the High Speed 2 rail link and Interchange.<sup>7</sup>**

3.12 All three of these challenges affect housing need in Solihull.

3.13 The subsequent ‘objectives’ set out in the context of Challenge B include the following:

**“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.**

**To ensure that provision is made for an appropriate proportion of the HMA shortfall in new housing land consistent with the**

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<sup>6</sup> Paragraph 9, page 5, Solihull Local Plan – Draft Submission Plan, October 2020

<sup>7</sup> Paragraph 38, page 12, Solihull Local Plan – Draft Submission Plan, October 2020

**achievement of sustainable development and the other objectives of the Plan.**

**Maximise the provision of affordable housing; ensuring the provision of an appropriate mix, type and tenure of housing on sites in a range of locations which meet the needs of Solihull residents, particularly needs for affordable housing, including social rented, low cost home ownership and supported housing, on a Borough wide basis.**

**Widen the range of options for older people and for people with learning, physical and sensory disabilities and mental health needs through the provision of accommodation which is designed to meet these diverse needs.”<sup>8</sup>**

3.14 Challenge D includes the following objectives:

- **Meeting aspirations of key businesses to enable them to maintain competitiveness (Birmingham Airport, National Exhibition Centre, Birmingham Business Park, Blythe Valley Park, Jaguar Land Rover) whilst contributing to sustainable development;**
- **Retaining and developing a high skilled workforce;**
- **Provide a range of housing to attract inward investment.<sup>9</sup>**  
(our emphasis)

3.15 The Council acknowledge the link between housing and labour in this objective.

3.16 Policy P5 of the Draft Plan – Provision of Land for Housing – allocates land for **15,017 dwellings** in Solihull over the 2020-2036 Plan period. This equates to **938 dwellings per annum (dpa)**.<sup>10</sup>

3.17 The justification for this level of housing is set out in the explanatory text for Policy P5. In summary, the text states that housing need in excess of the Standard Method minimum (807 dpa) is required to meet economic growth generated by the 'UK Central Hub' scenario set out in the Council's October 2020 'Housing and Economic Development Needs Assessment' (HEDNA).

3.18 The HEDNA concludes that 816 dpa is required to achieve the objective of supporting the UK Central Hub scenario. Growth of 816 dpa is therefore reported in the Draft Plan as representing housing need for Solihull Borough.<sup>11</sup>

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<sup>8</sup> Challenge B, pages 13-14, Solihull Local Plan – Draft Submission Plan, October 2020

<sup>9</sup> Challenge D, pages 15-16, Solihull Local Plan – Draft Submission Plan, October 2020

<sup>10</sup> Page 67, Solihull Local Plan – Draft Submission Plan, October 2020

<sup>11</sup> Paragraph 221, page 68, Solihull Local Plan – Draft Submission Plan, October 2020

3.19 However the Council also determines there to be total capacity for 15,017 dwellings 2020-2036 (938 dpa). On this basis the Draft Plan states that 2,105 dwellings will be provided for Birmingham City's unmet need. This is the difference between the Standard Method baseline (12,912 dwellings 2020-2036) and the capacity of 15,017 dwellings. The capacity of 15,017 dwellings is therefore set as the housing requirement.<sup>12</sup>

#### UK Central Solihull Hub Area

3.20 As explained above there is a link between the housing need determined by the Council's HEDNA, and the job growth expected to be created by the UK Central Hub. It is therefore of assistance to summarise how the Hub area is expected to grow, and its status both regionally and nationally.

3.21 The Draft Plan describes the Hub as follows:

**"The UK Central Solihull proposals present a unique opportunity on a nationally significant scale to bring forward major growth. This will contribute to wider strategic ambitions and in doing so make a substantial contribution to the economic growth aims of not just the Council, but also both the WMCA and the GBSLEP. The UK Central Solihull area, including The Hub, where key economic assets are located, also encompasses the proposed High Speed 2 Interchange railway station within the triangle of land bounded by the A45, A452 and the M42, known as Arden Cross."**<sup>13</sup> (our emphasis)

3.22 The status of the Hub emphasises its importance nationally. It is therefore imperative that enough homes are built to support the economic growth envisaged.

#### Summary

3.23 In summary, the following key points can be drawn from the Adopted Plan and the Supplementary Consultation document:

- A clear commitment to provide some of the wider HMA's unmet need;
- Housing delivery for Solihull Borough based on achieving growth in the UK central Hub;
- Acknowledgement that Solihull is in a unique geographical location which can support significant levels of new employment.

<sup>12</sup> Paragraphs 227-228, page 73, Solihull Local Plan – Draft Submission Plan, October 2020

<sup>13</sup> Paragraph 72, page 31, Solihull Local Plan – Draft Submission Plan, October 2020

3.24 Having established the policy context for Solihull, the following section considers recent evidence in respect of housing need and employment growth.

## 4.0 EVIDENCE BASE REVIEW

### i) Introduction

4.1 This section of our Report builds on the policy context summarised in section 3, by considering the most recent evidence published by the Council in respect of housing need and employment growth. This is predominantly set out in the recent 'Housing and Economic Development Needs Assessment' (HEDNA) published in October 2020 which includes several possible scenarios for employment and housing growth. In this section of the Report, we consider these scenarios and how they were generated.

### ii) Solihull HEDNA (October 2020)

#### Economic-led housing need assumptions

- 4.2 The Solihull HEDNA includes several sections relating to housing and the economy. This Report is concerned primarily with the sections of the HEDNA which determine the overall housing need for the Borough, and how this is calculated.
- 4.3 As discussed in the policy section of this Note, the final level of housing need (816 dpa) is linked to the economic growth expected in the UK Central Hub growth.
- 4.4 The HEDNA determines that growth will total 22,998 jobs in Solihull over the 16-year Plan period (1,437 jobs per annum – jpa). This is made up of a baseline job growth forecast from Experian (10,000 jobs 2020-2036), plus growth above the baseline generated by the UK Central Hub including expansion at Jaguar Land Rover, Birmingham Airport, the National Exhibition Centre and the HS2 interchange development Arden Cross (equating to an additional 12,998 jobs 2020-2036).<sup>14</sup>
- 4.5 The HEDNA determines the amount of housing required to support this level of job growth, by calculating the growth in the economically active population that will need to occur.

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<sup>14</sup> Paragraph 21, page 6, Solihull Borough HEDNA, October 2020

- 4.6 This is done by using a demographic forecasting model and applying a variety of assumptions alongside demographic assumptions (fertility, mortality, migration). These assumptions are listed as follows:
- Economic Activity Rates (EARs);
  - Unemployment rates;
  - Double jobbing (those with more than one job);
  - Commuting.
- 4.7 In respect of **EARs**, the HEDNA states that *"the future rates of change for economic activity are based on data provided by the Office of Budget Responsibility (OBR) produced in the summer of 2018. These are national rates and have been rebased and applied to Solihull based on 2011 census data."*<sup>15</sup> This is the same approach that Barton Willmore would take in applying EARs and we agree with its application. The demographic forecasting we present in the following section of this report is underpinned by the same approach to EARs.
- 4.8 In respect of **unemployment** rates the HEDNA states that *"The methodology assumes that the number of people that are unemployed in Solihull remains the same moving forward to 2036."* The number of people unemployed is presented in figure 32 of the HEDNA and is approximately 4,000 people in 2019. Based on the HEDNA data on economically active population in 2020 (Table 29) this equates to approximately 3.6% unemployed.
- 4.9 Barton Willmore's approach differs, as we have consulted the Annual Population Survey (APS) to determine the most recent calculation of unemployment. The APS is a continuous household survey, covering the UK. The topics covered include employment and unemployment, as well as housing, ethnicity, religion, health and education. The purpose of the APS is to provide information on important social and socio-economic variables at local levels.
- 4.10 The most recent data available is for the year up to June 2020 and therefore considers the initial effects of COVID-19. The unemployment rate in the most recent data is 4.2%. We have therefore assumed 4.2% unemployment in 2020, falling back to pre-COVID levels of 3.8% by mid-2022 and remaining at that level thereafter.

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<sup>15</sup> Paragraph 6.12, page 82, Solihull Metropolitan Borough Council HEDNA, October 2020

- 4.11 The HEDNA also applies an adjustment for **double jobbing**, i.e. people who have more than one job. The HEDNA applies an adjustment of 3.1% for this factor<sup>16</sup>, and Barton Willmore agree.
- 4.12 The **commuting ratio** is an important assumption. The HEDNA states *"In an area such as Solihull where more people in-commute for work than out-commute it may be the case that a lower increase in the economically active/working population would be required to provide enough workforce for a given number of jobs than if the reverse is true (and vice versa where there is net out-commuting)."*<sup>17</sup> As the HEDNA quite rightly confirms, the 2011 Census showed a commuting ratio of 0.98 for Solihull. This means that for every 98 new economically active residents, 100 jobs could be supported.
- 4.13 The HEDNA also comments *"there are likely to have been changes to commuting patterns since 2011 and there are likely to be further changes as a result of the anticipated level of growth set out herein."*<sup>18</sup> Barton Willmore agree with this in part, i.e. that commuting patterns are likely to have changed. We have therefore utilised the Annual Population Survey (APS) as well, which confirms the evidence of the HEDNA in Figure 34, i.e. there has been a fluctuation in the commuting ratio since the 2011 Census.
- 4.14 However, as our analysis shows in Table 4.1, the APS data suggests there has remained a net in-commute to Solihull over the most recent 5-year period available.

**Table 4.1: Annual Population Survey (APS) Resident and Workplace Population**

	APS		APS commuting ratio
	Resident	Workplace	
Jan 2015-Dec 2015	95,000	97,700	0.97
Jan 2016-Dec 2016	98,800	112,400	0.88
Jan 2017-Dec 2017	104,000	108,800	0.96
Jan 2018-Dec 2018	100,300	112,600	0.89
Jan 2019-Dec 2019	102,100	105,900	0.96
<b>Average</b>	<b>100,040</b>	<b>107,480</b>	<b>0.93</b>

Source: APS, December 2020

- 4.15 The average over the most recent five-year period available is 0.93 as Table 4.1 shows. In our demographic modelling we have therefore sensitivity tested our scenarios based on two approaches to commuting, 0.93 (APS average), and 0.98 (2011 Census). The HEDNA uses the

<sup>16</sup> Paragraph 6.16, page 84, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>17</sup> Paragraph 6.17, page 84, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>18</sup> Paragraph 6.20, page 85, Solihull Metropolitan Borough Council HEDNA, October 2020

2011 Census ratio throughout but as we explain below, assumes that some of the job growth in some scenarios will be taken up by residents of other Boroughs/Districts. This approach has a prominent impact on the resulting calculation of housing need.

#### Economic-led housing need scenarios

4.16 The HEDNA uses the assumptions discussed above to test a range of job growth numbers based on several scenarios. These scenarios can be summarised as follows:

- **Baseline Growth (10,000 jobs 2020-2036)** – this is the baseline job growth forecast obtained from Experian Economics.
- **Growth A (15,680 jobs 2020-2036)** – this is an increase from the baseline growth, which the HEDNA states as "*allowing for a greater influence of recent trends*"<sup>19</sup> and explains as follows; "*The 'growth' scenario does not rely on specific interventions but reflects modelled growth where locally high performing sectors of manufacturing, transport & storage, accommodation & food service, information & communication, real estate activities, and professional scientific & technical outperform the baseline forecast.*"<sup>20</sup>
- **Growth B (15,680 jobs 2020-2036)** – as above but 10,000 jobs at 2011 Ratios plus only 38.5% (2,187 jobs) of the additional 5,680 jobs are taken up by local residents. The HEDNA states this scenario is intended to "*inform duty to cooperate discussions with neighbouring authority.*"<sup>21</sup>
- **Growth C (UKC) (22,998 jobs 2020-2036)** – 10,000 jobs baseline growth plus 12,998 jobs created through the Hub. However, only 25.3% (3,250 jobs) of the additional 12,998 jobs will be taken up by Solihull residents. This is again said by the HEDNA to inform duty to cooperate discussions.

4.17 The preferred UK Central Hub scenario (Scenario C above) is based on a significant proportion of the economic-led housing need being met by surrounding local authorities, and states that this scenario (and scenario B before it) is to "*aid duty to cooperate discussion with neighbouring authorities.*"<sup>22</sup>

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<sup>19</sup> Paragraph 12.18, page 198, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>20</sup> Paragraph 22, page 6, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>21</sup> Paragraph 6.31, page 87, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>22</sup> Paragraph 6.34, page 90, Solihull Metropolitan Borough Council HEDNA, October 2020



- 4.18 The HEDNA therefore runs just a single scenario for the UK Central Hub job growth, based on growth of only 13,250 jobs in Solihull (of the 22,998-total generated by the UK Central Hub). Table 36 of the HEDNA shows how this would result in the 816 dpa being required in Solihull.
- 4.19 However, this means that the housing need generated by the remaining 9,750 jobs in the Growth C scenario would be generated in neighbouring authorities. This is simply an assumption as no evidence is presented to support this position and its purpose is simply stated within the HEDNA to be to 'aid' duty to cooperate discussions. There is no guarantee that neighbouring authorities will be agreeable to this approach. Furthermore, it is important to understand how many homes would be required in Solihull Borough if all jobs are taken up by Solihull residents so that the full quantum of housing need is understood.
- 4.20 Table 36 also shows how 'Growth A' would require **908 dpa** in Solihull based on the 2011 Census commuting ratio; a significant increase to the 817 dpa put forward as the recommended level of need to inform the housing requirement of the Plan.
- 4.21 However, the HEDNA does not test the outcome of the UK Central Hub scenario in the same way as 'Growth A'. This is an omission. All the scenarios should be tested in a similar manner to provide a full understanding of the potential housing need requirements for Solihull. We therefore provide the relevant consideration of the Growth C scenario in the following section of this Report.

#### Affordable Housing

- 4.22 BW do not advocate that affordable need has to be met in full when determining OAN, given the judgment of Mr Justice Dove in the Kings Lynn case (High Court Judgment)<sup>23</sup>. This concluded neither the NPPF nor the PPG suggest affordable housing need must be met in full.
- 4.23 However, in a Borough where housing affordability is a significant issue, the impact of affordable housing should be considered and *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.."*<sup>24</sup> (our emphasis)

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<sup>23</sup> Paragraphs 32-25, pages 10-11, High Court Judgment, Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government, ELM Park Holdings Ltd, 09 July 2015

<sup>24</sup> PPG, ID2a-024, 20 February 2019

4.24 The 2020 HEDNA states that the shortage of affordable housing is “clearly acute”<sup>25</sup> and determines ‘net’ affordable need of 578 dpa for Solihull. In this context the HEDNA concludes as follows:

**“The provision of new affordable housing is an important and pressing issue in the Borough.”**<sup>26</sup> (our emphasis)

**“The analysis identifies a need for 578 affordable homes to rent per annum. This scale of need the Council is justified in seeking to secure as much affordable housing as viability allows.”**<sup>27</sup> (our emphasis)

4.25 Based on the Plan’s requirement for 40% of homes to be affordable, OAN of 1,445 dpa would be required to deliver affordable need in full. The HEDNA’s conclusion of need (817 dpa) and the proposed housing requirement (938 dpa) would deliver only 57% and 65% of this figure respectively.

4.26 Affordable housing delivery in is another factor. The Council’s 2018/19 Annual Monitoring Report (AMR) (March 2020) records 1,105 net affordable completions in the past five years (221 per annum). Against the need determined by the 2020 HEDNA (578 affordable dwellings per annum) this would account for only 38% of need, while the delivery of affordable housing over the 2014-2019 period represents 32% of total housing completions during this time.

4.27 This is an important indicator of the Council’s failure to deliver affordable housing at the levels which the 2020 HEDNA considers are required moving forward. This is to be noted in the context of an affordable need position regarded as ‘clearly acute’ by the HEDNA. The Plan should therefore consider an increase in the total number of homes planned for to achieve as much affordable housing delivery as possible.

### iii) Summary

4.28 In summary, Barton Willmore agree with most assumptions used in determining economic-led housing need set out in the 2020 HEDNA.

4.29 However, an additional scenario to test the UK Central Hub growth scenario (22,998 jobs) is required to determine how many homes might be required to support this job growth in Solihull

<sup>25</sup> Paragraph 7.69, page 114, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>26</sup> Page 126, Solihull Metropolitan Borough Council HEDNA, October 2020

<sup>27</sup> Paragraph 35, page 7, Solihull Metropolitan Borough Council HEDNA, October 2020

where all jobs are filled by residents of Solihull. We provide this in the following section of this report, alongside testing an alternative commuting ratio based on the past 5 years data from the APS.

- 4.30 In addition, the HEDNA identifies an 'acute' situation in respect of affordable housing need. To date the council has struggled to deliver its affordable housing need. Since affordable homes will be delivered through private sector developments it is imperative that sufficient housing is provided to ensure that the maximum amount of the overall affordable housing requirement is met, subject to environmental constraints. Based on the past record of delivery the HEDNA's conclusion on overall need (816 dpa) should be increased to supply as much affordable housing need as possible.



## 5.0 DEMOGRAPHIC FORECASTING AND ECONOMIC GROWTH

### i) Introduction

- 5.1 This section of our Report provides a range of demographic forecasting scenarios which sensitivity test the results of the Council's HEDNA. Specifically we have sensitivity tested the number of jobs supported by the Standard Method (SM, 807 dwellings per annum), alongside the number of homes that would be required to support the level of job growth supported by the HEDNA (22,998 jobs 2020-2036).
- 5.2 This exercise is intended to test whether robust alternative assumptions to those used in the HEDNA provide different results in respect of future housing need. This is an important exercise due to the various assumptions used to underpin the demographic forecasting scenarios that have resulted in the HEDNA's conclusions.

### ii) Demographic forecasting scenario and results

#### Methodology and Assumptions

- 5.3 To undertake the demographic modelling, we have used the PopGroup model, managed by Edge Analytics and widely used for forecasting of this nature by a variety of groups and organisations, including local authorities and planning consultancies.
- 5.4 The model requires several different demographic and economic assumptions, and these have the potential to result in significant differences to the results and therefore the number of homes considered to be required through the Plan process.
- 5.5 For the purposes of this report we have used the most recent 2018-based ONS SNPP data for mortality, migration, and fertility rates. This is the most recent data module available from Edge Analytics, the company who manage the PopGroup model and its data.
- 5.6 However, ONS have stated how internal migration in the latest 2018-based ONS Sub National Population Projections (SNPP) is underpinned by a very short 2-year trend. This is due to the ONS changing the method by which internal migration is recorded. A 2-year trend is not as robust as the 5-year period used historically in ONS SNPPs. We have therefore sensitivity tested our

scenarios with the previous 2016-based ONS SNPP mortality, migration, and fertility rates to provide a more rounded picture.

5.7 In respect of Household Formation Rates (HFRs), we have used the 2014-based MHCLG household projections, thereby discounting the more recent 2016 and 2018 projections published by ONS. This is because of the criticism of the methodology employed by ONS in the 2016 and 2018 projections<sup>28</sup>, and the decision of Government to underpin the Standard Method with the 2014 projections.

5.8 We have also used two approaches to commuting. The first is the 2011 Census, a widely accepted approach. However, given the age of that data, we have also used the Annual Population Survey (APS), and the average commuting ratio recorded over the past five years (0.93). Again, this approach provides a more encompassing approach.

5.9 In this context the assumptions used in the modelling are summarised below:

- 2016/2018-based ONS Mortality, Migration, and Fertility Rates;
- 2019 ONS Mid-Year Population Estimates;
- 2014-based Ministry for Housing, Communities and Local Government (MHCLG) household formation rates;
- 2014-based MHCLG institutional population;
- July 2018 Office for Budget Responsibility (OBR) economic activity projections;
- 2011 Census commuting ratio (0.98)/Annual Population Survey (APS) commuting ratio average 2014-2019 (0.93);
- Unemployment recorded by the APS in the year up to June 2020 (4.2%) falling to 3.8% (pre-Covid) by 2022 and remaining at 3.8% thereafter;
- Double Jobbing (those with more than one job) assumption in the 2020 HEDNA (3.1%).

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<sup>28</sup> 2016/2018 household projections are underpinned by trends drawn from 2001 to the present. This differs from the 2014 projections and all household projections which came before, which were underpinned by trends since 1971. The 2016/2018 projections are therefore underpinned by a period in which housing became rapidly more unaffordable at a national and local level. This has manifested itself in the significant increase since 2001 of 'concealed families', those who cannot afford to form their own independent households and instead are forced to live with friends or relatives. The use of the 2016/2018 household projections for Planning purposes would therefore be a self-fulfilling prophecy. Furthermore the 2018-based household projections are underpinned by the 2018-based ONS Sub National Population Projections (SNPP). These SNPP are based on a 2-year net internal migration trend, rather than the more representative 5-year period used in previous SNPPs.

Standard Method for calculating minimum housing need (October 2020)

5.10 Below we set out the results of our demographic modelling scenario which constrains the model to the number of homes calculated by the Standard Method, i.e. **807 dpa**. As PPG identifies this should be the **minimum** level of housing need considered for the purposes of the Plan. PPG also recognises how 'actual' housing need may need to be higher than the Standard Method minimum to meet other growth aspirations. As we have summarised in previous sections of this report, Solihull Borough Council (SBC) have clear growth aspirations for the Plan period and it is therefore imperative that the housing requirement seeks to achieve these aims and objectives over the 16 year Plan period.

**Table 5.1: Standard Method dwelling-led scenario (807 dpa) – 2016-based ONS SNPP rates**

	2020	2036	2020-2036 (per annum)
Population	217,020	242,297	25,277 (1,580)
Economically Active Population	110,875	122,996	12,121 (758)
Jobs Supported <sup>1</sup>	108,361	120,709	12,349 (772)
Jobs Supported <sup>2</sup>	114,213	127,228	13,015 (813)

Source: Barton Willmore modelling

<sup>1</sup>2011 Census commuting ratio (0.98) continuing from 2020-2036;

<sup>2</sup>Change in commuting ratio between 2011 and 2020 from 0.98 to 0.93. Commuting ratio of 0.93 continuing 2020-2036.

5.11 Table 5.1 shows how the minimum level of housing need for Solihull (807 dpa) would only support **between 772 and 813 jobs per annum** over the Plan period. This range is based on two assumptions of commuting being applied to the change in the economically active population, as we have explained above.

5.12 The difference in the number of jobs at the start of the Plan period (2020) in the two results set out above is due to 1) an assumption that the 2011 Census commuting ratio has remained unchanged since 2011, and 2) that the ratio has changed over the nine years from 0.98 to 0.93 and remains at 0.93 thereafter.

5.13 We have sensitivity tested the same scenarios set out in Table 5.1, with the 2018-based ONS SNPP assumptions in respect of mortality, migration, and fertility rates. The results are set out in Table 5.2.

**Table 5.2: Standard Method dwelling-led scenario (807 dpa) – 2018-based ONS SNPP rates**

	2020	2036	2020-2036 (per annum)
Population	217,311	246,349	29,038 (1,815)
Economically Active Population <sup>1</sup>	111,243	127,307	16,064 (1,004)
Jobs Supported <sup>1</sup>	108,721	124,941	16,220 (1,014)
Jobs Supported <sup>2</sup>	114,592	131,688	17,096 (1,068)

Source: Barton Willmore modelling

<sup>1</sup>2011 Census commuting ratio (0.98) continuing from 2020-2036;

<sup>2</sup>Change in commuting ratio between 2011 and 2020 from 0.98 to 0.93. Commuting ratio of 0.93 continuing 2020-2036.

5.14 The results set out in Table 5.2 show how the different fertility, mortality, and migration rates of the 2018-based ONS SNPP would affect the number of jobs which could be supported by 807 dpa 2020-2036. This increases from a range of 772 to 813 dpa under the 2016 ONS SNPP rates, to between 1,014 and 1,068 jobs per annum.

5.15 This increase in the 2018 rates scenario is largely driven by an assumption of higher internal (UK-wide) and external (overseas) in-migration to Solihull. However, given the concerns over the methodology used to determine internal migration, the 2018-based ONS SNPP should be treated with some caution.

5.16 However, taken together, a reasonable mid-point would suggest that 807 dpa would support approximately 900 jobs per annum, or between 14,500 and 15,000 jobs over the Plan period.

5.17 This would fall well short of the 22,998 jobs which the HEDNA recommends as the growth which should underpin the level of housing need.



### Economic Growth

- 5.18 The HEDNA states that growth of 816 dpa 2020-2036 is required to achieve the baseline job growth plus the UK Central Hub growth scenario presented in the HEDNA. This equates to 22,998 jobs 2020-2036 (1,437 jobs per annum).
- 5.19 Having established that the Standard Method (807 dpa) would fail to support this level of job growth, we have sensitivity tested the HEDNA's conclusions based on the assumptions set out at the start of this section. Our results are set out in Tables 5.3 and 5.4 below.

**Table 5.3: Economic-led scenario (22,998 jobs 2020-2036) – 2016-based ONS SNPP rates**

	2020	2036	2020-2036 (per annum)
Population <sup>1</sup>	217,020	260,607	43,587 (2,724)
Population <sup>2</sup>	217,020	258,423	41,253 (2,595)
<b>Economically Active Population</b>			
Economically Active Population <sup>1</sup>	110,875	131,017	22,624 (1,414)
Economically Active Population <sup>2</sup>	110,875	132,316	21,441 (1,340)
<b>Dwellings</b>			
Dwellings <sup>1</sup>	92,128	112,104	19,975 (1,248)
Dwellings <sup>2</sup>	92,128	111,308	19,180 (1,199)

Source: Barton Willmore modelling

<sup>1</sup>2011 Census commuting ratio (0.98) continuing from 2020-2036;

<sup>2</sup>Change in commuting ratio between 2011 and 2020 from 0.98 to 0.93. Commuting ratio of 0.93 continuing 2020-2036.

**Table 5.4: Economic-led scenario (22,998 jobs 2020-2036) – 2018-based ONS SNPP rates**

	2020	2036	2020-2036 (per annum)
Population <sup>1</sup>	217,311	257,588	40,247 (2,515)
Population <sup>2</sup>	217,311	255,525	38,214 (2,388)
Economically Active Population	111,243	133,866	22,623 (1,414)
Economically Active Population	111,243	132,683	21,440 (1,340)
Dwellings <sup>1</sup>	92,117	109,480	17,363 (1,085)
Dwellings <sup>2</sup>	92,117	108,687	16,570 (1,036)

Source: Barton Willmore modelling

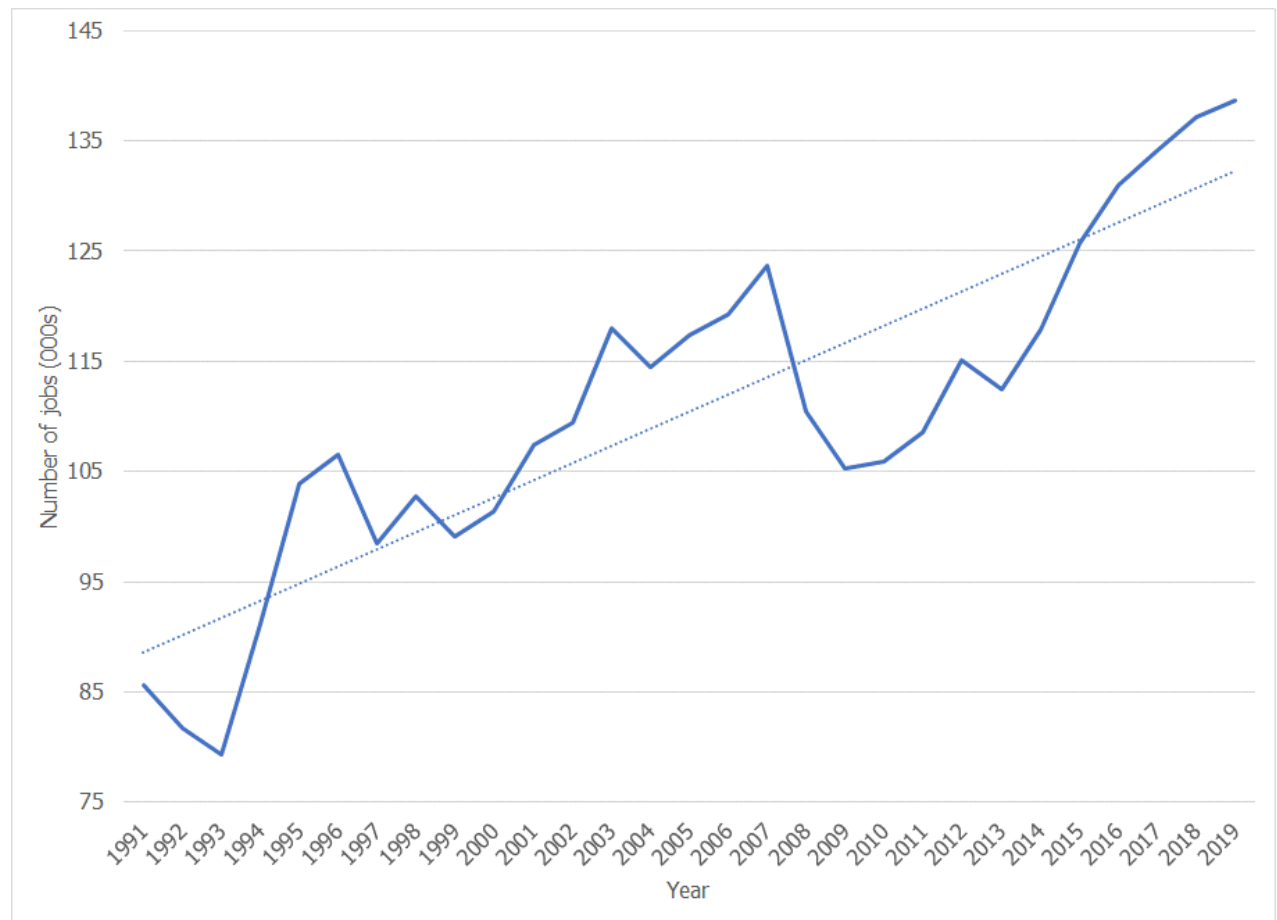
<sup>1</sup>2011 Census commuting ratio (0.98) continuing from 2020-2036;

<sup>2</sup>Change in commuting ratio between 2011 and 2020 from 0.98 to 0.93. Commuting ratio of 0.93 continuing 2020-2036.

- 5.20 The above tables show how need in Solihull would range **between 1,199 and 1,248 dpa** based on the 2016-based ONS SNPP demographic rates. This reduces to **between 1,036 and 1,085 dpa** based on the more recent 2018-based ONS SNPP rates.
- 5.21 For reasons already explained, we would consider that the 2016-based ONS SNPP rates are more robust. However, a mid-point housing need figure of a **minimum 1,150 dpa** to meet growth of 22,998 jobs 2020-2036 would be a reasonable conclusion.

#### Historic job growth and housing need

- 5.22 Alongside the UK Central Hub scenario we have considered above, historic levels of job growth should also be considered. We have obtained this data from Oxford Economics dating back to 1991, and have therefore set out historic levels of job growth for Solihull in Figure 5.1 below:

**Figure 5.1: Historic levels of employment in Solihull, 1991-2019**

Source: Oxford Economics, October 2020

- 5.23 Figure 5.1 illustrates how the historic levels of job growth have fluctuated significantly in Solihull. In deciding on a reasonable calculation of past job growth to use for modelling purposes, an arbitrary period cannot be used. For example, using the most recent 10-year period (2009-2019) shows that there was growth of 34,000 jobs (3,400 jobs per annum). Similarly, using the inter-censal period between 2001 and 2011 would show a much less pronounced increase (1,200 jobs). Both figures illustrate the need to analyse historic levels of job growth more closely.
- 5.24 Barton Willmore's approach is therefore to identify 'peaks' and 'troughs' in the number of jobs, which provides a more realistic calculation of average job growth in the past. For Solihull there are clear peaks above the trend line (dotted line in Figure 5.1) in 1996 and 2016. Over this 20-year period there was growth of 24,500 jobs (1,225 jobs per annum). In contrast there are clear troughs below the trend line in 1993 and 2009; this results in growth of 26,400 jobs (1,650 jobs per annum).

5.25 In this context Barton Willmore consider that the UK Central Hub scenario (1,434 jobs per annum) favoured by the HEDNA and used to underpin economic-led housing need calculations is a realistic and reasonable level of job growth to expect in Solihull over the Plan period.

**iii) Summary**

5.26 In summary, the key points from this section are as follows:

- The Government's existing Standard Method calculates a minimum need of 807 dwellings per annum in Solihull, 2020-2036. Our demographic modelling shows how this will serve to support between 12,349 and 17,096 jobs 2020-2036;
- A mid-point of this suggests approximately 14,500 – 15,000 jobs over the Plan period. The Standard Method will therefore only support a maximum 65% of the job growth supported by the Council in their 2020 HEDNA (22,998 jobs 2020-2036);
- Economic-led demographic forecasting scenarios show a need for between 16,570 and 19,975 dwellings 2020-2036 (between 1,036 and 1,248 dpa);
- A mid-point therefore suggests a need for 18,500 homes over the Plan period to support the UK Central Hub scenario supported by the Council.

## 6.0 GREATER BIRMINGHAM AND BLACK COUNTRY UNMET HOUSING NEED

### i) Introduction

- 6.1 Solihull Borough Council (SBC) is located within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and is therefore responsible for delivering a proportion of any unmet need from authorities within the HMA, alongside the other 13 local authorities within the HMA.
- 6.2 This issue has been identified by SBC throughout the Plan process and has been updated in the Draft Submission Plan following the July 2020 GBBCHMA Position Statement.
- 6.3 The Position Statement concludes that capacity in Birmingham City has now increased to 65,400 dwellings<sup>29</sup> 2011-2031. The shortfall from the OAN determined by the adopted plan (89,000 dwellings 2011-2031) has therefore reduced to 23,600 dwellings.
- 6.4 Once commitments by HMA Local Plans to delivering unmet need have been considered, the Position Statement concludes that the shortfall is reduced from 23,600 to only 2,597 dwellings up to 2031. This represents a fall in the amount of shortfall still to be delivered of 13,728 dwellings since the baseline Strategic Growth Study (SDS) was produced.<sup>30</sup>
- 6.5 However, the July 2020 Position Statement concedes that there will be a HMA shortfall *post* 2031 in the wider HMA, with the Black Country alone estimating a shortfall of 29,620 dwellings.<sup>31</sup> However notwithstanding this comment the Position Statement makes no estimate of what the unmet need might be post 2031.
- 6.6 Solihull's Draft Plan makes an allowance for an additional 2,105 dwellings 2020-2036 to meet some of the unmet need recognised by the Birmingham City Development Plan. As set out in paragraph 3.19 above, this allowance is based on the difference between the capacity for housing identified by SBC (15,017 dwellings) and the Standard Method for calculating minimum housing need (12,912 dwellings).

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<sup>29</sup> Table 6, Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

<sup>30</sup> Paragraph 6.2, Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

<sup>31</sup> Paragraph 6.2, Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

6.7 The housing requirement for the Draft Submission Plan is therefore set at 15,017 dwellings 2020-2036 (938 dpa). On a pro rata basis this suggests 1,447 dwellings will be delivered by SBC towards Birmingham's unmet need up to 2031.

6.8 In this section we consider the conclusions of the July 2020 position statement on unmet need up to 2031, alongside possible unmet need beyond 2031.

## ii) Adopted Birmingham City Plan Unmet Need 2011-2031

6.9 As we have outlined above, the July 2020 GBBC HMA Position Statement concludes there to be a shortfall of 2,597 dwellings against Birmingham City's unmet need up to 2031.

6.10 However, Barton Willmore consider this figure to be far higher at **between 11,294 and 13,101 dwellings** up to 2031 (see Table 6.1).

**Table 6.1: Adopted Birmingham City Plan Unmet Housing Need 2011-2031**

Local Authority	Existing/ Proposed Plan period	Total Provision for GBBC HMA Unmet Need	Average annual contribution	Pro rata contribution to BCC unmet need 2011-2031	Shortfall against BCC Local Plan	
<b>Birmingham City</b>	2011-31	n/a	n/a	n/a	23,600 <sup>1</sup>	<b>Birmingham City Deficit to 2031</b>
<b>Bromsgrove</b>	2023-40	0	0	0	n/a	
<b>Cannock Chase</b>	2018-36	0 – 2,500	0 – 139	0 – 1,807	n/a	
<b>Lichfield</b>	2018-40	4,500	205	2,659	n/a	
<b>Redditch</b>	2011-30	0	0	0	n/a	
<b>Solihull</b>	2020-36	2,105	132	1,447	n/a	
<b>Tamworth</b>	2006-31	0	0	0	n/a	
<b>North Warwickshire</b>	2014-33	3,790	199	3,391	n/a	
<b>Stratford-on-Avon</b>	2011-31	265	13	265	n/a	
<b>Black Country<sup>2</sup></b>	2019-38	3,000*	158*	1,895*	n/a	
<b>South Staffordshire</b>	2018-37	4,000	200	2,737	n/a	
<b>Total</b>		<b>14,660 – 17,160</b>	<b>n/a</b>	<b>10,499 – 12,306</b>	<b>23,600</b>	<b>11,294 – 13,101</b>

<sup>1</sup> Table 6, page 12, Greater Birmingham and Black Country Housing Market Area (GBBC HMA) Housing Need and Housing Land Supply Position Statement (July 2020), OAN (89,000 dwellings) – Capacity (65,400 dwellings);

<sup>2</sup> The Black Country authorities are unable to meet their own need. We have therefore excluded the contribution of 3,000 dwellings to BCC's unmet need from the table and associated calculations;

- 6.11 Barton Willmore's position is based on the latest Local Plan position in each of the authorities and the amount of HMA unmet need they are proposing to deliver. However it should be noted that the unmet need figures proposed in the Plan are not exclusively for BCC and instead look to address unmet need across the HMA.
- 6.12 Furthermore, several of the proposed plan periods exceed 2031. It cannot therefore be assumed that the individual Local Plans will deliver their unmet need proportions by 2031, where their plan periods extend beyond 2031.
- 6.13 We have therefore made a pro-rata calculation of the proposed contribution based on the number of years in the proposed Plan period up to 2031, i.e. Lichfield propose 4,500 dwellings over their plan period (2018-2040); therefore  $4,500/22$  years (205 dwellings per annum) x 13 years (2018-2031) = 2,659 dwelling contribution up to 2031.
- 6.14 It should be noted that we consider this to be a 'best case' scenario as it assumes all delivery will be towards BCC's unmet need, whereas the Black Country will also have unmet need up to 2031.
- 6.15 Alongside BCC, the Black Country should also be considered, in the context of the July 2020 GBBC HMA Position Statement's admission that the Black Country has evidenced a significant shortfall through its 2019 Urban Capacity Review Update (UCRU) of **up to 29,260 dwellings between 2019 and 2038**, against the 2019 NPPF's Standard Method (SM).<sup>32</sup>
- 6.16 From this overall figure the UCRU states there will be a shortfall of 7,485 dwellings up to 2031. However, if we were to look at the overall shortfall as an average, it would suggest a much higher shortfall totalling 18,480 dwellings up to 2031 ( $29,260/19$  years = 1,540 dpa x 12 years (2019-2031) = 18,480 dwellings shortfall).

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<sup>32</sup> Paragraph 2.13, Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

**iii) GBBCHMA Unmet Housing Need 2011-2031**

- 6.17 The analysis set out above relates solely to Birmingham City Council's adopted Plan, which was assessed under the provisions of the 2012 NPPF and the Objective Assessment of Housing Need (OAHN).
- 6.18 However, as of October 2020 Local Plans must now be prepared by using the Standard Method, introduced by the 2019 NPPF. It is important to emphasise how the Standard Method determines minimum housing need for each local authority.
- 6.19 The PPG is very clear that 'actual' housing need may be higher, and this is most notably emphasised in the case of Birmingham City.
- 6.20 In Birmingham City, minimum housing need under the Standard Method is 'capped' at **3,577 dpa**. This is despite step 1 of the Standard Method calculation – the 2014-based MHCLG household projections – showing need of nearly 1,000 dpa higher (4,538 dpa).
- 6.21 Furthermore, step 2 of the Standard Method leads to a **12% uplift** to the 2014-based MHCLG household projection. This results in a Standard Method calculation of 5,069 dpa, a **42% increase** to the 'capped' figure that would apply at the present time.
- 6.22 Birmingham City benefit from the 'capped' figure of 3,577 dpa due to the status of the Local Plan, which has been adopted within the past 5 years. Where a Plan has been adopted within the past 5 years, the final Standard Method figure is capped at 40% above the average annual housing requirement figure set out in the existing policies i.e.  $2,555 \times 40\% = 3,577$  dpa.
- 6.23 The Birmingham City Plan was adopted on 10 January 2017. This means that on the 11 January 2022 (14 months at the time of writing), the Standard Method will be capped at 40% above **whichever is the higher of** a) the projected household growth for the area over the 10 year period identified in step 1; or b) the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).
- 6.24 For Birmingham City, a) applies and the Standard Method calculation will exceed 5,000 dpa as of early 2022.



6.25 It is therefore considered appropriate to consider what the Standard Method would mean for Birmingham and the HMA.

6.26 We have considered this in Table 6.2. Additionally, we have included other authorities in the GBBC HMA where the Standard Method would lead to unmet need.

**Table 6.2: GBBC HMA Standard Method Minimum Unmet Housing Need 2011-2031**

Local Authority	Existing/ Proposed Plan period	Standard Method (uncapped)	Current/ Emerging Plan Requirement	Unmet Need Total 2011-2031	Total Provision for Unmet Need 2011-2031	
<b>Birmingham City</b>	2011-31	3,577 (5,069)	2,555	20,440 (50,280)	n/a	
<b>Bromsgrove</b>	2023-40	379	379	0	0	
<b>Cannock Chase</b>	2018-36	276	284/312/ 367/423	0	0/360/1,083/ 1,806	
<b>Lichfield</b>	2018-40	321	536	0	2,659	
<b>Redditch</b>	2011-30	174	337	0	0	
<b>Solihull</b>	2020-36	807	938	0	1,447	
<b>Tamworth</b>	2006-31	149	177	0	0	
<b>North Warwickshire</b>	2014-33	171	436	0	3,391	
<b>Stratford-on-Avon</b>	2011-31	603	730	0	265	
<b>Black Country</b>	2019-38	3,756	2,220	18,432	1,895*	
<b>South Staffordshire</b>	2018-37	254	466	0	2,737	
<b>Telford &amp; Wrekin</b>	2011-31	n/a	0	2011-31	0	
<b>Shropshire</b>	2016-38			2016-38	1,023	
<b>Total</b>		<b>10,467</b>	<b>9,058 – 9,197</b>	<b>38,872</b>	<b>11,522 – 13,329</b>	<b>25,543 – 27,350</b>

\*Black Country cannot meet its own need. Contribution to BCC unmet need excluded

6.27 As Table 6.2 summarises, the Standard Method would result in **minimum** unmet need across the GBBC HMA of **25,543 dwellings up to 2031**. This is based on the 'capped' figure which currently applies in Birmingham City. This is made up of unmet need from Birmingham City and the Black Country authorities only and is based on the Birmingham City Plan figure of 51,100 dwellings 2011-2031. If we were to assume the increased capacity (65,400 dwellings 2011-2031) set out in the

Position Statement the unmet need would still be **between 11,243 and 13,050** dwellings up to 2031, very similar to the conclusion we have made in Table 6.1.

- 6.28 However, as we have identified above, the 'actual' uncapped housing need calculation for Birmingham City would increase this dramatically to **approximately 55,000 dwellings up to 2031** based on the Birmingham Local Plan figure, falling to between 41,083 and 42,890 dwellings based on the increased capacity for Birmingham suggested by the Position Statement. This higher figure will represent unmet need in the HMA when the existing Birmingham Plan becomes more than five years old in January 2022.

#### Unmet Need Beyond 2031

- 6.29 Several emerging Local Plans in the HMA cover a period exceeding 2031, and it is therefore appropriate to consider what the level of unmet need may be beyond 2031 and up to 2040.
- 6.30 The 2020 Position Statement recognises there will be unmet need after 2031, but does not provide an estimate of what this might be, only stating the following:

**"It is, however, now apparent that there will be a HMA shortfall post 2031, with the Black Country alone estimating a shortfall of 29,260, which it will consider through the Black Country Plan review. The scale of the post 2031 shortfall for Birmingham, and potentially other authorities, is not yet known, therefore the post 2031 shortfall for the whole HMA cannot yet be calculated."** <sup>33</sup>

- 6.31 Following the same method that we have applied to the tables above (i.e. pro rata delivery of unmet need in emerging plans) we have identified how the existing Standard Method would create unmet need of between **17,000 and 18,400 dwellings 2031-2040**.
- 6.32 However, the Government's recent 'Planning for the Future' proposals in respect of how the Standard Method minimum is calculated should also be considered.
- 6.33 If the proposed changes to the Standard Method are adopted by Government, there will be unmet need in all but one authority of the GBBCHMA. This will mean unmet need of **between 29,400 and 30,100 dwellings 2031-2040**.

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<sup>33</sup> Paragraph 6.3, Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020)

**iv) Summary**

- 6.34 In summary, this section has identified the extent of unmet housing need in Birmingham City against the Adopted Birmingham City Plan, following the publication of the July 2020 Position Statement.
- 6.35 Barton Willmore have considered the content of the Position Statement and conclude that the deficit in BCC's unmet need to be delivered by Local Plans up to 2031 is **between 11,294 and 13,101 dwellings up to 2031**, as opposed to the 2,597 dwellings suggested in the Position Statement.
- 6.36 Furthermore, we have considered the unmet need that is likely to result from the 2019 NPPF's Standard Method across all authorities in the GBBCHMA. Based on the existing Standard Method we have concluded this unmet need to be **between 25,543 and 27,350 dwellings up to 2031**. If we were to assume the increased capacity (65,400 dwellings 2011-2031) set out in the Position Statement the unmet need would still be **between 11,243 and 13,050 dwellings up to 2031**.
- 6.37 The existing Standard Method will lead to an additional unmet need of **between 17,700 to 18,400 dwellings 2031-2040**.
- 6.38 If proposed changes to the Standard Method are adopted, this would increase to **between 29,400 and 30,100 dwellings 2031-2040**.



## 7.0 SUMMARY AND CONCLUSIONS

7.1 This Technical Report responds to the consultation of the Solihull Local Plan – Draft Submission and specifically whether the housing need figure of 816 dpa 2020-2036 will support the economic growth aspirations of the Draft Plan. The key points to note from our analysis are as follows:

- Planning Practice Guidance (PPG) states the Standard Method (SM) figure represents the **minimum** housing need;
- 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 2020-2036	Dwellings per annum 2020-2036
Dwelling-constrained: Standard Method	2016 ONS rates	772 <sup>1</sup> – 813 <sup>2</sup>	807
	2018 ONS rates	1,014 <sup>1</sup> – 1,068 <sup>2</sup>	
Employment-constrained: UK Central Hub	2016 ONS rates	1,437	1,199 <sup>1</sup> – 1,248 <sup>2</sup>
	2018 ONS rates		1,036 <sup>1</sup> – 1,085 <sup>2</sup>

Source: Barton Willmore Development Economics

<sup>1</sup> Commuting Ratio 0.98

<sup>2</sup> 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**.

7.2 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.**