

Solihull Local Plan – Draft Submission Plan (October 2020)

Representations on behalf of IM Land in
respect of Land at Rumbush Lane

December 2020

Turley

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Contact

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December 2020

1. Introduction

- 1.1 We write on behalf of our client, IM Land (hereafter referred to as 'IM'), who are working with the landowners in response to the Solihull Metropolitan Borough Council's Local Plan – Draft Submission Plan (DSP), which was published for consultation in October 2020.
- 1.2 IM Land are actively promoting land around at Rumbush Lane (site reference 141 and 554) known as 'Rumbush Village'. IM Land, the strategic land division of IM, and IM Properties are actively promoting several sites and assets within the Borough; separate representations have been submitted in relation to IM Land's other interests and IM Properties interests.
- 1.3 The site that forms the subject of these representations is in a single land ownership and is therefore deliverable within the Plan Period (to 2036) and is in a highly sustainable location, immediately adjacent to Earlswood train station.
- 1.4 It is relevant to note that the site forms part of a development opportunity, comprising land located within Stratford-on-Avon District Council's (SDC's) boundary. Whilst IM Land would welcome the opportunity to discuss this cross working further with officers at both SMBC and SDC, for the purpose of these representations, the focus in the first instance is on the potential of land within SMBC's boundary.
- 1.5 The representations are structured as follows:
 - **Section 2:** Provides a summary of the Site and the opportunity it presents.
 - **Section 3:** Provides our response to the Local Plan – Draft Submission Plan (DSP) (October 2020).
 - **Section 4:** Provides a conclusion to these representations
- 1.6 Appendices are provided with this report, and include an updated Vision document that demonstrates the site's ability to deliver in a manner that is appropriate to its sustainable location.

2. The Site and its Surroundings

Historic Site Promotion

- 2.1 IM submitted representations to the Draft Local Plan Review Consultation (DLPRC) which was published for consultation in November 2016 and the Draft Local Plan Supplementary Consultation (DLPSC) which was published for consultation in January 2019.
- 2.2 Previous representations submitted to the DLPRC and the DLPSC focussed on a much wider site area – approximately 90 to 95 hectares of land focussing around Earlswood Station. However, since this time, the proposals for the site have been considered further as set out below

Call for Sites April 2020

- 2.3 Since January 2019, further design work has taken place to determine how best to deliver the site in the shorter term, to support SMBC in meeting their housing need. Through this design work the proposed site has reduced in scale.
- 2.4 The amended proposals were submitted to SMBC in April 2020 as part of the Borough's 'Call for Sites', a copy of the submission can be found at **Appendix 1**.

The Proposals in December 2020

- 2.5 Following submission to the 'Call for Sites' a further process of design considerations took place, this was in response to research in to the shortfall of accommodation for older people within the Borough.
- 2.6 Barton Willmore, on behalf of IM, prepared a report titled 'Older People's Housing Need, Solihull Borough' (January 2020) which highlighted the significance that should be placed on the delivery of specialist accommodation for older people. The report concluded that there is an immediate requirement for specialist accommodation for older people within the District. A copy of the report is attached at **Appendix 2**, and its findings have influenced the updated emerging proposals for this site.
- 2.7 An updated Vision Document, dated December 2020 (**Appendix 3**), has been prepared for the area to the east of Earlswood Station, demonstrating how the site could deliver a sustainable development that would result in the following benefits:
 - **Homes:** Up to 62 new homes along with Accommodation for older people adjacent to Earlswood Station which could include a mix of specialist independent living and care (C2 and C3 uses).
 - **Landscape Buffer:** A planted buffer will provide a physical and visual break in development, ensuring that a sensitive edge is created to neighbouring land and preventing the potential for coalescence.

- **Supporting uses:** Opportunity for a community shop close to Earlswood Station along with potential supporting uses with any accommodation for older people, such as café, shop or hairdressers.
- **Public Open Space:** Up to 5.88ha of attractive and varied area of public open space, providing recreation and drainage features. The creation of a village green at the heart of the development is proposed, retaining existing landform and trees and reflecting the character of Warwickshire villages.
- **Public Rights of Way:** Enhancements to public rights of way to improve legibility and quality of surface. A footpath access to the station can also be provided.
- **Access and Movement Hierarchy:** Multiple points of access and a stratified movement hierarchy will provide principal routes, secondary routes and shared surfaces, ensuring connectivity, safety and variety.
- **Sustainable Transport:** The site is adjacent to an underutilised railway station, just 25 minutes from both Birmingham and Stratford upon Avon.

Wider Potential

- 2.8 As set out above, there is an opportunity to expand the site into land within SDC boundary. The Vision Document and **Appendix 3** identifies how the wider development could be delivered and how an additional 74 homes (or 54 homes and an additional 0.57ha of older people's accommodation) could be delivered alongside the SMBC parcel.
- 2.9 The site proposals, when taken as a whole, could therefore deliver the following:
- 136 new homes with 1.37ha of accommodation for older people and up to 7.54ha of public open space; or
 - 116 homes with 1.94 ha of accommodation for older people and up to 7.54ha of public open space.

3. Response to the Local Plan – Draft Submission Plan (DSP) (October 2020)

- 3.1 We respond to the individual policies within DSP in respect of the land at Rumbush Lane, Solihull, below.

Borough Vision – Overview

- 3.2 SMBC's ambitions with their vision are supported, namely to provide a range of quality homes across the Borough by 2036 whilst also setting out the opportunity to maximise the economic and social benefits of the High Speed 2 rail link and interchange both for the Borough and wider area.
- 3.3 However, the vision fails to identify the important link between the provision of new employment opportunities and the requirement to deliver new homes within the Borough. The two are intrinsically linked and together will ensure a prosperous future for SMBC. It is concerning that this link has not been made at the outset of the DSP. As currently drafted the Borough Vision sets the tone for an unbalanced and uncoordinated plan.
- 3.4 We comment further on the impact that the provision of new employment opportunities has on the housing requirement in our response to Policy P5 'Provision of Land for Housing', below.

Spatial Strategy

- 3.5 IM support SMBC's proposed Spatial Strategy, as set out in paragraphs 63 to 67 of the DSP, specifically the overall strategy to focus significant developments in locations that are, or can be made, accessible and sustainable.
- 3.6 The Scope, Issues and Options consultation in November 2015 set out the following 7 Growth Options for the Borough and at paragraph 64, the DSP confirms that SMBC has focussed on options E, F and G:
- Growth Option A: High Frequency Public Transport Corridors & Hubs
 - Growth Option B: Solihull Town Centre
 - Growth Option C: North Solihull/Chelmsley Wood
 - Growth Option D: Shirley Town Centre & the A34 Corridor
 - **Growth Option E: The UK Central Hub Area & HS2**
 - **Growth Option F: Limited Expansion of Rural Villages/Settlements**
 - **Growth Option G: New Settlements, Large Scale Urban Extensions or Significant Expansion of Rural Villages/Settlements**

- 3.7 Whilst the DSP has set out the growth options and the overall Spatial Strategy it has failed to take the next important step and set out a specific settlement hierarchy. It is considered that the preferred growth options should be accompanied by a settlement hierarchy that would identify how the vision and spatial strategy would be delivered through the Plan Period.
- 3.8 A settlement hierarchy should be set within a policy position, which identifies the most sustainable locations for growth. This should in turn be evidenced by the Sustainability Appraisal (SA) that takes into account factors such as access to public transport. This approach would also assist in the overall development management and delivery of windfall sites during the Plan Period, which themselves are expected to deliver 2,800 new homes by 2036.

Site Selection

- 3.9 IM raised concerns about the Site Selection process within their representations to the DLPSC in 2019. Whilst it is noted that the methodology is now set out in the document titled 'Reg 19 Draft Local Plan: Site Selection Process Topic Paper' dated October 2020 (the 'Topic Paper'), there has been no updates to the methodology. On this basis, IM's objection to the Site Selection remains the same, and is set out below.
- 3.10 The Site Selection process was carried out in two stages, the first of which determined where in the site hierarchy each site fell within.
- 3.11 It is considered that the 'Step 1 – Hierarchy Criteria' does not fully align with the recommendations within the National Planning Policy Framework February 2019 (NPPF). SMBC have acknowledged the need to release Green Belt land for development and have given first consideration to land which has been previously developed (PDL). However, the NPPF at paragraph 138 states that:
- "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport."*** (Emphasis added)
- 3.12 SMBC have not referenced land which is well served by public transport within the Site Hierarchy Criteria, Footnote 5 of the Topic Paper provides a definition of an 'accessible Green Belt location' stating that:
- "An accessible location is located either (a) on the edge of an urban area, (b) on the edge of a settlement that has a wide range of services including a primary school and range of retail facilities. In this context a broad approach to accessibility is used based on a sites location in/edge of urban area or settlement. A finer grain of accessibility is used at step 2."*
- 3.13 SMBC have also given consideration to a site's performance against the five purposes of including land within the Green Belt ahead of land which is well served by public transport – this is not the approach recommended by the NPPF. Consideration as to the impact on the Green Belt should take place at Step 2.

- 3.14 Step 1 in the site selection process has failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF. It is considered that, if the ‘Step 1 – Site Hierarchy Criteria’ had been approached correctly, land around at Rumbush Lane would have progressed to be considered at Step 2, rather than being immediately discarded. The site is located on the main railway line between Birmingham and Stratford-upon-Avon, and is therefore in a highly sustainable location, in line with the NPPF ‘test’.
- 3.15 Step 2 in the site selection process assesses sites considered to be a potential allocation (yellow) or an unlikely allocation (blue) against a set of refinement criteria, to confirm whether these sites should be green or red. Sites considered green or red at step 1 do not require further assessment.
- 3.16 The refinement criteria for step 2, at page 14 of the Topic Paper do not include sites that are well served by public transport within the ‘factors in favour’. Therefore, Step 2 in the site selection process has failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF.
- 3.17 The methodology for the site selection process should be amended to align with the recommendations within the NPPF. The current approach immediately discards any potential sites at stage 1, such as Earlswood, which provides the opportunity to deliver new homes in a sustainable location.
- 3.18 It is considered that land at Rumbush Lane should pass through Step 1 as a Green Site which would not have to be considered at Step 2. However, if the site were considered to be yellow or blue Table 3.1, below, provides an assessment of land at Rumbush Lane against the Refinement Criteria. This assessment provides evidence that the site should be considered for allocation through the Local Plan Review.

Table 3.1 Assessment of land at Rumbush Lane against Refinement Criteria

Factors in Favour	Assessment of land at Rumbush Lane
In accordance with Spatial Strategy	SMBC have identified that exceptional circumstances exist to release land from to Green Belt to deliver their housing need. The site presents an opportunity to provide homes in a sustainable location which is well served by public transport.
Any hard constraints only affect a small proportion of the site and/or can be mitigated.	The main hard constraint to the site is the railway line – this, however, provides an opportunity due to the site’s proximity to Earlswood station. The railway line does not impact upon the availability, achievability or deliverability of the site.
Site would not breach a strong defensible boundary to the Green Belt	The site provides the opportunity to create a new village in a sustainable location – therefore preventing the sprawl of existing settlements. The Green Belt boundary (as amended) could be suitably addressed.

Any identified wider planning gain over and above what would normally be expected.	<p>As set out in the Vision Document, the site provides the following planning gains:</p> <ul style="list-style-type: none"> • Opportunity to create a high quality, desirable place to live that provides for local and strategic housing needs and will appeal to people of all ages and backgrounds. • Landscape and ecological resources such as trees and hedgerows within the site form a characterful feature of the land that can be preserved wherever possible. • Significant opportunity to identify points of access into the development and opportunities for through movement within the site to promote movement on foot and by bicycle, particularly into Earlswood station. • Opportunity to enhance existing public rights of way through the site, allowing the potential to connect to surrounding assets.
Sites that would use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.	Technical evidence prepared by Barton Willmore demonstrates that the site provides the opportunity to create a strong defensible boundary.
If finer grain accessibility analysis shows the site (or part to be included) is accessible.	<p>The site is able to deliver new services that enhance its accessibility, Footway provision can also be provided along the site frontage.</p> <p>Earlswood train station provides 3 services per hour in the morning peak and 2 in the evening; which provides access to jobs and retail services in Birmingham, Shirley and Stratford.</p> <p>All of these measures increase the accessibility and the resultant scoring of the site Solihull's site assessment</p>
Factors Against	Assessment of land at Rumbush Lane
Not in accordance with the spatial strategy.	SMBC have identified that exceptional circumstances exist to release land from to Green Belt to deliver their housing need. The site presents an opportunity to provide homes in a sustainable location which is well served by public transport.
Overriding hard constraints that cannot be mitigated.	There are no overriding hard constraints that cannot be mitigated.

SHELAA Category 3 sites unless demonstrated that concerns can be overcome.	The SHELAA dated November 2016 identified that land around Earlswood Station (site ref 141) fell with Category 1 <i>“(deliverable) – site is suitable, available and achievable and faces no constraints which might prevent it from coming forward within the first five-year period.”</i>
Site would not use or create a strong defensible boundary to define the extent of land to be removed from the Green Belt.	The site provides the opportunity to create a strong defensible boundary.
If finer grain accessibility analysis shows the site (or the part to be included) is not accessible.	Means to improve and enhance the accessibility of the site, through a mix of uses and new transport infrastructure, as well as using the existing rail station, demonstrate how the accessibility of the site and the associated scoring can be improved.
If the site is in a landscape character area that has a very low landscape capacity rating.	<p>The site is located within LCA 2 ‘Southern Countryside’ which covers an area of approximately 14km² to the south of the Shirley area of Solihull. The Landscape Capacity Assessment concludes that: <i>“The LCA being of High overall landscape sensitivity and Medium landscape value, suggests that the LCA would typically have an overall Very Low landscape capacity to accommodate new development”</i>.</p> <p>The Landscape Character Assessment states that it is not possible to establish a definitive baseline sensitivity to change without having details of a given development proposal.</p> <p>The Vision Document provides a site specific Sensitivity Analysis which concludes that the proposed development would be acceptable with mitigation.</p>
If the SA appraisal identifies significant harmful impacts.	<p>The Larger ‘Land north of Earlswood Station’ site has been assessed within the SA dated October 2020 (AECOM ID: AECOM70, SMBC ref: HH3). The SA identified three <i>“Significant negative effects likely / mitigation essential”</i> namely:</p> <ul style="list-style-type: none"> • SA4a Soil: The Site Pro-forma states that the site <i>“Contains more than 20 ha of agricultural land 1-2 or >20ha of 1-3b land”</i>.

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- SA10 Landscape Sensitivity: The Site Pro-forma states *“Landscape with high sensitivity to change”*.
 - SA19b Distance to convenience store or supermarket: The Site Pro-forma states that the site is 1,287m from a local convenience store.

SMBC have identified that exceptional circumstances exist to release land from to Green Belt to deliver their housing need. Such an approach will lead to the loss of agricultural land, the impacts of this loss can be mitigated through the presence of exceptional circumstances.

The smaller parcel of land, submitted as part of the April 2020 ‘Call for Sites’ (site reference: 554), was not considered as part of the SA.

The Vision Document provides details of how the site can deliver a convenience store with the potential for provision supporting uses within the accommodation for older people. The convenience store would reduce the need for any short trips to be made. Therefore the site would be able to comply with SA19 once delivered.

- 3.19 The Greater Birmingham and Black Country HMA commissioned GL Hearn and Wood PLC to undertake a Strategic Growth Study during 2017 to define how and where this housing could be delivered.
- 3.20 Opportunity areas were identified within the GL Hearn study, including ‘South of Birmingham’, a broad, non-specific area of land between Birmingham and Stratford upon Avon (location NS5) which was identified as having potential for a new settlement.
- 3.21 It states that the methodology was *“applied to rail corridors where there is sufficient land such that development would not result in the physical coalescence between the new settlement and an existing town”*.
- 3.22 Land around at Rumbush Lane (site reference 141 and 554) is located within the South of Birmingham opportunity area. However, due to the site selection methodology this site was immediately discarded and considered “red”.
- 3.23 The Vision Document attached at **Appendix 3** has been prepared for the site demonstrating how a development could deliver a sustainable new development that could result in the following benefits:

- **Homes:** Up to 62 new homes along with Accommodation for older people adjacent to Earlswood Station which could include a mix of specialist independent living and care (C2 and C3 uses).
- **Landscape Buffer:** A planted buffer will provide a physical and visual break in development, ensuring that a sensitive edge is created to neighbouring land and preventing the potential for coalescence.
- **Supporting uses:** Opportunity for a community shop close to Earlswood Station along with potential supporting uses with any accommodation for older people, such as café, shop or hairdressers.
- **Public Open Space:** Up to 5.88ha of attractive and varied area of public open space, providing recreation and drainage features. The creation of a village green at the heart of the development is proposed, retaining existing landform and trees and reflecting the character of Warwickshire villages.
- **Public Rights of Way:** Enhancements to public rights of way to improve legibility and quality of surface. A footpath access to the station can also be provided.
- **Access and Movement Hierarchy:** Multiple points of access and a stratified movement hierarchy will provide principal routes, secondary routes and shared surfaces, ensuring connectivity, safety and variety.
- **Sustainable Transport:** The site is adjacent to an underutilised railway station, just 25 minutes from both Birmingham and Stratford upon Avon.

3.24 Land at Rumbush Lane has the opportunity to contribute towards housing need, in a sustainable location where people want to live, supported by a range of facilities. It is considered that, following a review of the site selection methodology, Land Rumbush Lane would be a suitable site for the provision of new homes within the district.

Providing Homes for All

Policy P4A – Meeting Housing Needs – Affordable Housing

3.25 IM are pleased to note that SMBC have re-worded their policy requirement for affordable housing and have reverted back to provision based on a percentage (40%) of overall dwellings.

3.26 It is also encouraging to note that SMBC have built in flexibility within the policy to allow negotiations to take place on a site by site basis to reflect the viability of individual sites.

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

3.27 The 'Older People's Housing Need, Solihull Borough' (January 2020) report attached at **Appendix 2**, states that there is an immediate requirement for specialist accommodation for older people within the District.

3.28 The report confirmed that the total need for specialist older people's accommodation amounts to 3,612 units. Separately, within the Borough, it is determined that there

exists a current requirement for an additional +491 units of registered care places, a need that is expected to increase by +738 to total +1,229 units by 2035 after accounting for population growth.

- 3.29 IM therefore supports the wording of the policy that states that applications for specialist housing for older people will be supported. However, in order to strengthen the policy it is considered that SMBC need to review their evidence base to fully support the policy. It would also be beneficial for SMBC to identify areas that would be most suitable for providing specialist housing for older people, as set out in the Vision Document at **Appendix 3**, the Site provides the opportunity to contribute to this identified need in a sustainable location.

Policy P5 – Provision of Land for Housing

- 3.30 It is acknowledged that SMBC state that they have allocated sites to ensure sufficient housing supply to deliver 15,017 additional homes in the Plan Period (to 2036).
- 3.31 Policy P5 should also include the additional homes SMBC have allocated at UK Central Hub Area (2,740) which together with the identified 5,270 would amount to 8,010 net additional homes in the period 2020 – 2036. The additional allocations for UK Central Hub Area are listed within the supportive text and justification for the policy, however they should be included within Policy P5.
- 3.32 The total requirement of 15,017 is comprised of:
- 12,912 homes arising from the Local Housing Need (LHN) Standard Method minimum requirement of 807 dwellings per year (dpa) over the plan period (2020 to 2036); and
 - 2,105 homes as a contribution to the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Shortfall up to 2031.
- 3.33 The DSP assumes that any additional growth from the UK Central Hub Area would amount to a small increase of housing requirement of 9 additional homes per year (144 over the plan period). SMBC have then assumed that these additional homes would most likely be for people travelling from outside of the Borough, and therefore fall within the contribution to the GBHMA.
- 3.34 IM have concerns about SMBC's approach to the overall housing need over the Plan Period. The concerns are:
- The unmet need of the wider GBBCHMA has been under-estimated. Barton Willmore, on behalf of IM, have prepared a report titled 'Solihull Borough Housing Need Technical Note' (December 2020), enclosed at **Appendix 4**. The 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**;
 - SMBC have not mentioned the GBBCHMA shortfall arising post 2031. The Housing Need and Housing Land Supply Position Statement (July 2020) stated

that “*The Black Country has evidenced a significant shortfall through its 2019 Urban Capacity Review Update of up to 29,260 between 2019 and 2038, against LHN. Whilst this shortfall starts to arise during the term of this position statement and is estimated to be 7,485 up to 2031, the majority (over 20,000 homes), will arise post 2031*”. Whilst it is acknowledged that this additional shortfall will be considered through the Black Country Plan review and informed by the Birmingham Development Plan review, when they commence, it is clear that there is a significant shortfall arising from the GBBCHMA within the DSP plan period. The Housing Need Technical Note (**Appendix 4**) states that the unmet need post 2031 is calculated to be a minimum of 17,700 dwellings between 2031 and 2040. It is considered that in order to strengthen the DSP, a review policy or trigger should be included to address this additional shortfall once the quantum has been tested.

- The limited additional housing requirement arising from the UK Central Hub Area appears to be at odds with the Borough’s ambitious Vision for the UK Central Hub Area. The Housing Need Technical Note (**Appendix 4**) states that growth of between 1,036 and 1,248 dpa would be required to support the UK Central Hub scenario (between 15,576 and 19,968 dwellings over the plan period). 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**.

- 3.35 IM agrees that the use of the standard methodology represents a good ‘starting point’ in determining the local housing need. In the first instance it is important to highlight that the standard method for assessing housing needs provides a minimum starting point (PPG reference ID: 2a-010-20190220).
- 3.36 However, it is clear that several of the circumstances identified within the PPG as being appropriate circumstances within which to plan for a higher number of homes than the standard method indicates are quite clearly applicable to Solihull. A key factor that is of particular relevance is in relation to the potential for ‘supergrowth’ associated with High Speed 2 (HS2), the planned investment in strategic infrastructure improvements at UK Central Hub Area and elsewhere in the Borough to facilitate growth.
- 3.37 It is important that the Council seriously consider whether the growth associated with the new HS2 interchange, and the wider plans for major economic development and associated residential development at UK Central Hub Area needs to be further analysed and better understood before the Local Housing Need figure is fixed based on the standard methodology.
- 3.38 Economic growth associated with HS2 has been considered by the Greater Birmingham and Solihull LEP in their Midlands HS2 Growth Strategy (July 2015). This document makes clear that there is a significant potential to deliver growth on a nationally significant scale over and above the construction of HS2. The report concludes that the arrival of the two HS2 stations into the region “will drive new areas for regeneration, housing and business growth across the Midlands”. This so termed ‘supergrowth’ has the potential to drive a significant demand for additional housing within the Borough.

- 3.39 Previous representations submitted by Turley on behalf of IM Land, raised concerns that the Housing Need identified in the DLPRC and DLPSC did not make adequate provisions for 'supergrowth', and indeed did not reflect the Council's own ambitions (as set out within the plan) for economic growth within the Borough. These concerns still stand, and without understanding at this stage whether the Council's position on employment and the potential for 'supergrowth' has changed, it is difficult to confirm whether 'exceptional circumstances' may exist to justify the use of an alternative approach to the determination of local housing need.

Windfall Sites

- 3.40 It is noted that SMBC intend to deliver 2,800 new homes through Windfall Sites from 2020 to 2036 (175 homes per year). As set out in our response to the Spatial Strategy, it is necessary for SMBC to include a Settlement Hierarchy within the DSP to direct any future growth from windfall sites to the most appropriate and sustainable locations.
- 3.41 The Draft SHELAA Updated (October 2020) Appendix I 'Historic Windfall Rates' provides a breakdown of net windfall rates from 1992/1993 to 2019/2020. Appendix I states that there is an 'all years mean' (1992 – 2020) of 208 windfall dwellings per year. The 'ten year mean' (2010 – 2020) is 251 windfall dwellings per year and the 'five year mean' (2015 to 2020) is 243 windfall dwellings per year. This is therefore the evidence that SMBC are relying upon to confirm that they can deliver 175 homes per year through windfall sites. SMBC have acknowledged that there is a need to release land from the Green Belt to deliver the LHN for the District, therefore to require an additional 2,800 dwellings on non-Green Belt speculative sites appears to be ambitious even in the context of past delivery.

4. Summary

- 4.1 IM is keen to see a more holistic approach to and consideration of the key factors to be addressed within the DSP. In particular, a more comprehensive approach to housing needs at both the local level and in terms of accommodating a proportion of unmet need from within the wider HMA. It is important that these factors are addressed in order that the Council can be satisfied that the quantum of land they are seeking to identify, and the associated spatial strategy that this will reflect, are sound.
- 4.2 It is considered that Step 1 in the site selection process failed to give sufficient weight to sites which are well served by public transport and is therefore not in accordance with the NPPF. It is considered that, if the 'Step 1 – Site Hierarchy Criteria' has been approached correctly, land at Rumbush Lane would have progressed to be considered at Step 2. The site is located on the main railway line between Birmingham and Stratford-upon-Avon, and is therefore in a highly sustainable location, in line with the NPPF 'test' at paragraph 138.
- 4.3 IM have concerns about SMBC's approach to the overall housing need over the Plan Period. The concerns are:
- The unmet need of the wider GBBCHMA has been under-estimated. The 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**;
 - SMBC have not mentioned the GBBCHMA shortfall arising post 2031. The Housing Need Technical Note states that the unmet need post 2031 is calculated to be a minimum of **17,700 dwellings between 2031 and 2040**. It is considered that in order to strengthen the DSP, a review policy or trigger should be included to address this additional shortfall once the quantum has been tested.
 - The limited additional housing requirement arising from the UK Central Hub Area appears to be at odds with the Borough's ambitious Vision for the UK Central Hub Area. The Housing Need Technical Note states that growth of between 1,036 and 1,248 dpa would be required to support the UK Central Hub scenario (between 15,576 and 19,968 dwellings over the plan period). 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**.
- 4.4 Land at Rumbush Lane has the opportunity to contribute towards housing need, in a sustainable location where people want to live, supported by a range of facilities. It is considered that, following a review of the site selection methodology, Land around at Rumbush Lane would be a suitable site for the provision of new homes within the district.

4.5 IM would be pleased to discuss the content of these representations in further detail with the Council and would welcome the opportunity to arrange a meeting with officers in the short-term to answer some of the queries raised within this response.

**Appendix 1: 'Call for Sites' Submission, April
2020**

**Appendix 2: Older People's Housing Need,
Solihull Borough (January 2020)**

**Appendix 3: Vision Document for Rumbush
Village, December 2020**

**Appendix 4: Solihull Borough Housing Need
Report (December 2020)**

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