

**SOLIHULL LOCAL PLAN
DRAFT SUBMISSION PLAN**

**RESPONSE SUBMITTED ON BEHALF OF
WOODS FARM CHRISTMAS TREES**



TwelveTwentyOne Planning Services Ltd



INTRODUCTION

This response to the Draft Submission Plan for Solihull has been prepared on behalf of Woods Farm Christmas Trees Limited, owners of a large site which is proposed for development (in part) on land south of Bills Lane in Shirley. This submission sets out the comments, both supportive and critical, in respect of the Draft Submission Local Plan and is to be considered both as a comprehensive report on the Local Plan together with specific, noted, submissions.

Spatial Strategy (Page 24) –

The spatial strategy is **supported** as it is considered that this represents the most effective and sustainable means of delivering the scale of housing growth that is necessary to meet the affordability and other housing needs set out in the Draft Submission Plan. In particular Growth Option G is considered to be the preferred option strategy for the bulk of housing delivery.

Policy P4A (Affordable Housing) –

Supported on the basis that 40% affordable housing is the level necessary to address the issue of affordability which is the most acute in the West Midlands.

Policy P4C (Market Housing) –

The general provisions of this policy are **supported**.

Policy P4D (Self Build) –

This is **supported** and is considered to be a key component of housing delivery and provision of choice.

Policy P4E (Housing for Older and Disabled People) –

Supported.

Policy P5 (Provision of Land for Housing) –

This policy is **not supported** on the basis that it is considered that the housing requirement is low and will not fully reflect both local needs and the pressures on Solihull emanating from Birmingham. Setting too low a target will make it impossible to address affordability which, at Paragraph 155, the Draft Submission Local Plan acknowledges is the most severe across the West Midlands. Appropriate additional provision should therefore be made up to at a total of some 10,000 net additional homes.

Housing Trajectory (Page 63 onwards) –

The housing trajectory is **supported**, subject to the concerns expressed above in respect of Policy P5, particularly with regard to the proposed allocation of 300 dwellings on land at Whitlocks End Farm – Site BL3.

However, it is noted that this could accommodate up to 750 dwellings, as set out in the Vision Document attached to this submission, which will provide additional flexibility for the Council should other sites fail to come forward, are delayed or if housing figures are increased. More detailed comments are set out below.

The summary table in Paragraph 222 is considered to be incorrect in that Whitlocks End Farm (BL3) is in part previously developed land with some four hectares of hardstanding and sheds.

In terms of the delivery of this site, the suggested delivery periods are accepted.

The site is in single ownership and the owners are experienced developers in their own right. Whilst they would not wish to develop out all of the site themselves, they

are able to ensure that the site is brought forward quickly. A full suite of supporting studies has been undertaken including, very recently, detailed transportation and utility assessments. These all demonstrate that there are no constraints to the early release and delivery of this site and, accordingly, the projected delivery period is agreed and accepted. This deliverability of the large allocations is key if the Council is to achieve the required level of growth (set out in Paragraph 228).

Policy P7 (Accessibility) –

This is accepted and **supported**. It is essential that as much development as possible is accommodated with access to public transport and also encourages and facilitates accessibility by pedestrian and cycle modes.

Policy P8 (Managing Travel Demand/Reducing Congestion) –

This is **supported**. There is clearly a need to locate development where it can reduce reliance upon private motorised transport. It has to be accepted that any development will generate some additional traffic, no matter how much it facilitates and encourages the use of public transport and other non-car borne modes. As such, it is essential that the bulk of housing delivery is located where the full effects of traffic impact has been fully modelled and assessed. This has occurred in respect of site BL3 where it is agreed with the Council that up to 750 dwellings can be accommodated in accordance with the principles set out in the Policy P8.

Policy P17 (Green Belt) –

This policy is **not supported** and objected to in very strong terms in the context of the proposed boundary to the Green Belt around site BL3.

Green Belt boundaries should endure for more than one plan period and should provide sufficient flexibility to enable the Council to meet its housing requirements in the short term should sites be delayed or not brought forward for some reason. In this regard, the Council hasn't attempted to identify "reserve sites" that serve no long term

Green Belt function and which could be brought forward for development should that be necessary to meet housing or other needs.

It is proposed that land adjoining site BL3 at Whitlocks End Farm should be excluded from the Green Belt in the same manner and in accordance with the submitted Vision Document (attached).

This Vision Document demonstrates the development that accords with the Council's objectives of maintaining a 300 metre separation between South Shirley and Dickens Heath and also follows existing hedgerows which form strong and natural boundaries. It also maintains the separation to Majors Green to the west established by the existing railway embankment.

The Vision Document also demonstrates how the proposed allocation BL3 can be implemented yet allows for a natural extension to accommodate further development, particularly to the east, as a natural rounding off of development up to the proposed new public open space.

Redrawing the Green Belt boundary to comply with this Vision Document will not only facilitate further development, if required, of up to 750 dwellings in total but it will also provide a natural edge to Shirley which accords with the five purposes of Green Belts as set out in Paragraph 134 of the NPPF.

Policy P17A (Green Belt Compensation) –

Supported.

The Vision Document referred to above also demonstrates very clearly how the “compensatory improvements” required to comply with Paragraph 138 of the NPPF can be achieved in respect of site BL3 (as proposed in the Submission Draft Local Plan or as proposed in the Vision Document attached). There will be far greater and enhanced public accessibility in the form of additional and circular walks and access through to the new large area of public space to the east. In addition it is recognised

that there is potential to locate playing fields close to the proposed housing area (possibly also to support further development in Dickens Heath) as part of a comprehensive master plan. It is also proposed that a new canal marina could be accommodated to the southwest of site BL3. This has been assessed by the landowners who have sought specialist advice which has concluded that this would be both practical and feasible. Such a marina would not just help meet a real need for additional canal related berths and facilities but it could also form a base for other facilities for public recreation across the retained Green Belt area.

Policy P20 (Open Space/Recreation/Leisure) –

Supported.

It is clear that open recreational facilities (both formal and informal) underpins community health (both physical and mental). As such the encouragement for proposals that retain (where appropriate) and enhance such facilities is supported. In addition, the support given to the role that waterways play in meeting this, plus the support that is provided to proposals that will enhance the formal and informal use of the river and canal network, is also welcomed.

As noted above, site BL3 will fully accord with Policy P20, including presenting an opportunity to enhance access to the countryside and the canal network policy.

Policy BL3 (Whitlocks End Farm) –

This is **supported** with the following additional points noted.

The promoters (who are the owners) intend to meet the requirements of Policies P4 (A, D and E) in full.

Furthermore, the owners are also experienced small scale housing developers and builders and who thus fully understand the benefits and requirements of SME housebuilders. Accordingly, it is proposed that up to 10-15% of the houses to be

provided will be released through smaller sites of up to one hectare to support SME house builders in accordance with the minimum requirements of Paragraph 68 of the NPPF. This will not only assist the Council meet this requirement but it will also help to accelerate delivery of housing in this area and to create a more varied residential scheme.

In addition, attention is drawn to the aforementioned Vision Document as submitted which details proposed principles of development in accordance with the requirements of Policy BL3. Agreement has been reached with the Council in respect of accessibility and offsite highway works (all of which are either in Highway land or are in the same ownership as the entirety of Site BL3 (and adjoining land)).

As previously noted, this site has an opportunity to be extended to accommodate up to 750 dwellings with no diminution to the effectiveness of the Green Belt in this area nor to its overall form and function. It is for this reason that it is also proposed that this site be extended, in accordance with the submitted Vision Document, and allocated for a total of 750 dwellings (with at least 300 dwellings to be provided within this plan period) as required to meet any reduction in other proposed sites or increase in the overall housing requirement.

The full suite of supporting information that underpins this submission is set out in the Vision Document and includes a detailed Heritage Assessment relating to the single listed building within the site.

Attention is also drawn to the fact that some four hectares of PDL is included within the proposed development area so the site is not all greenfield. There are also some twenty existing dwellings within the site.

By being in a single private ownership site BL3 can be delivered in accordance with the Council's housing needs and trajectory since the owners are not constrained in the same way as, say, is the case with volume national house builders or land promoters.

The site in its existing proposed form (BL3) and as proposed (up to 750 dwellings) would not only meet the Council's objectives for the form and function of the Green Belt (P17) by maintaining the separation between Shirley and Dickens Heath but will also represent a more natural rounding off to the southern edge of Shirley using natural hedgerow boundaries to establish the circa 300 metre separation to the south with the new public open space to the east and the railway line to the west.

This location is highly accessible to all modes of transport in accordance with Policy P7 and will establish a clear sense of place in accordance with Policy P15 whilst respecting and enhancing natural and heritage assets in accordance with Policies P10 and P16.

Furthermore, the proposal offers the clear opportunity to enhance accessibility to the countryside, building on and incorporating within it existing and proposed bridle paths, open space, etc and making full use of the canal environment in accordance with Policies P17A and P20.