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25044/A3/SJ/JB/bc

14th December 2020

Dear Sir/Madam,

**SOLIHULL LOCAL PLAN - REGULATION 19 PROPOSED SUBMISSION DRAFT CONSULTATION
OAK GREEN, LAND AT KNOWLE FARM, DORRIDGE**

Thank you for inviting comments on the Regulation 19 Proposed Submission Solihull Local Plan ('draft SLP'). We respond on behalf of Heyford Developments Ltd (our Client) who are promoting Oak Green, Land at Knowle Farm, Dorridge (the 'site') for residential development. Our Client has most recently submitted representations to the 'Draft Local Plan Supplementary Consultation' (2019) in relation to the Local Plan Review process, where the site was consulted on by the Council as an 'Amber Site'. As we set out below, there are significant issues with the draft SLP which necessitate the identification of additional housing sites. It is submitted that our Client's site is available, deliverable and suitable for meeting this increased need in a sustainable way within the early years of the Plan period, and that it should therefore be removed from the Green Belt and identified as a residential allocation.

In support of this, a Vision Highlights document is included at **Appendix 1** of these representations. This was previously submitted to the Council in May 2020. We also submit a red line plan at **Appendix 2** – the Council's site assessment should be updated to reflect the correct site area as per the previously submitted Vision Highlights. The Council have assessed the site incorrectly as 27.09 hectares with a capacity of 602 dwellings; however the site 24.20 hectares with a capacity of around 340 dwellings (which also takes into account the eastern parcel of land being a Country Park – see Appendix 1). This has been raised with the Council previously and we again request that the Council's Site Assessment document is updated to reflect this please. At **Appendix 3** we provide a Housing Technical Note which supports our comments in relation to the housing requirements of the draft SLP.

Our Client's site is located to the east of Dorridge and is within walking distance of the village centre and its train station. Throughout the representations we refer to "Knowle, Dorridge and Bentley Heath" as "Dorridge" or "Knowle and Dorridge", depending on the context. For the purposes of these representations, these terms are interchangeable given the draft SLP identifies the three villages of Knowle, Dorridge and Bentley Heath as one settlement given they are physically and functionally linked.

It is noted that the draft SLP will largely replace the Solihull Local Plan (2013). The only exceptions to this are the site allocations from the 2013 Plan which remain to be brought forward and the Gypsy and Traveller Site Allocations Document (2014) which will continue to be used alongside Policy P6 of the draft SLP.

The National Planning Policy Framework (NPPF) sets out the key framework for plan-making including the 'tests of soundness' for Local Plans (paragraph 35). The National Planning Practice Guidance (PPG) provides further advice on plan making and how these tests can be met, for instance in terms of evidence base gathering and working collaboratively with other relevant bodies on strategic planning matters. It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recent 'Planning for the Future' White Paper (August 2020). Whilst there does not appear to be any specified date for Submission of the draft SLP (with the January 2020 Local Development Scheme now out of date) we understand Solihull Borough Council (SBC) intend to submit the draft SLP for Examination following on as soon as possible from the consultation. It is therefore expected that the current NPPF and tests of soundness will still be applicable. Our comments are therefore submitted with the current national policy framework considerations in mind. We respond in chronological order to specific elements of the draft SLP and provide a series of suggested changes as relevant. Further details are provided on our Client's site in support of our comments.

Vision and Spatial Strategy

Whilst we are generally supportive of the Vision we note that the reference to 'protection of the Green Belt' does not necessarily take into account the fact that there are exceptional circumstances (as per the NPPF, paragraphs 136-137) with Solihull Borough which justify the release of appropriate Green Belt sites. **The current wording is therefore considered unsound as it is not consistent with national planning policy. The Vision should refer to 'protection of the remaining Green Belt (which contains the strategically important Meriden Gap) as necessary, alongside sustainable growth...**

The Vision emphasises the opportunity around HS2-related growth, particularly UK Central. As we set out in more detail below, there is a disconnect between these economic growth aspirations and the level of housing growth proposed. If this is not addressed, the Vision will not be realised in the most sustainable manner. In our view, this is a fundamental issue that must be addressed through housing policies and we provide detailed comments on this below.

We are supportive of the principles of the spatial strategy to direct growth to both the main urban areas and sustainable rural settlements as well as maximising the opportunities of UK Central Hub. We concur with the Council's view that 'exceptional circumstances' exist to justify the release of Green Belt via the 'balanced dispersal' strategy. However, we consider that there is potential for further growth to be accommodated within the spatial strategy, including in directing more growth to the sustainable settlement of Dorridge (and Knowle). The draft SLP's justification for the comparatively low level of growth at Dorridge is unclear, despite the spatial strategy and the evidence around its sustainability. **We therefore consider that the level of growth apportioned via the spatial strategy is unsound as it is not justified or consistent with national planning policy.**

The draft SLP (paragraphs 61-67) states the previous Scope, Issues and Options consultation (2015) identified that whilst many elements of the spatial strategy in the current Solihull Local Plan (2013) remain relevant, the Local Plan Review is being undertaken in a different strategic context and needs to accommodate a substantial increase in the level of growth; for instance meeting wider housing market area needs and the progression of HS2 and its associated developments at UK Central. Seven growth options were identified in 2015 with Options A-D focused on urban growth primarily (e.g. around transport corridors and centres such as Solihull) and Options E-G covering growth associated with UK Central Hub & HS2 and the expansion of rural village/Settlements, as well as New Settlements

and Large urban extensions. Option F related to the limited expansion of rural villages/Settlements whilst Growth Option G covered New Settlements, Large scale urban extensions or Significant Expansion of Rural Villages/Settlements.

The draft SLP notes that there is extremely limited land available within the relevant Options A-D related to the urban areas. Therefore, the Council has had to look at Options E-G, requiring Green Belt release (paragraph 64 of the draft SLP). Development is focused in locations that are, or can be made, accessible and sustainable and includes:

- Locations adjacent to the urban edge/a highly accessible settlement; or
- Located adjacent to a settlement that although it may be less accessible, it has a wide range of local services (including a secondary school, which is relevant to Balsall Common and Knowle/Dorridge/Bentley Heath); or
- Development that would be a proportionate addition adjacent to an existing settlement that although is less accessible still has a limited range of services available (including a primary school).

Developments that are isolated from any settlement; represent a disproportionate addition to a settlement with limited services; or are in a relatively less accessible location will be discouraged via the spatial strategy. The application of the 'balanced' dispersal' spatial strategy results in a number of site options coming forward under each of the strategic growth options (paragraph 69 of the draft SLP). The relevant allocated sites are set out within the Summary Table of Residential Allocations (paragraph 226 of the draft SLP).

The Sustainability Appraisal for the draft SLP (SA, 2020) identifies, at paragraphs 4.1.6-7 that as part of the 2015 assessment of strategic growth options, the options performing less well were Option F (Limited Expansion of Rural Settlements) and Option G (Urban Extensions or Significant Rural Expansions). However, it noted that **"given the many different permutations that could be developed within both of these options, it was considered unwise to dismiss the exploration of expansion of some of the rural settlements such as Knowle/Dorridge, Hampton-in-Arden and Balsall Common."**

The Overall Approach Topic Paper (October 2020, paragraphs 112-114) notes that under the Growth Options for E, F and G areas of opportunity were identified for further consideration in this regard (using the Local Plan evidence base, including Accessibility Mapping and the Green Belt Review). At Appendix A it is detailed that under Growth Option F the settlements of Balsall Common, Cheswick Green, Dickens Heath and Knowle, Dorridge and Bentley Heath were all identified as opportunity areas for further consideration for development. At Growth Option G the settlements of Hampton-in-Arden, Hockley Heath and Meriden are identified as opportunity settlements. A number of smaller settlements are not considered appropriate for growth via this option. Under Growth Option A, the potential for Green Belt release along Public Transport Corridors and Hubs was also considered including for sites at Knowle/Dorridge and Hampton-in Arden.

The Overall Approach Topic Paper (paragraphs 129-134) also sets out how the preferred spatial strategy for the Draft Local Plan (2016) was informed by the Draft Local Plan Interim SA (2016) which assessed five different spatial approaches to housing delivery including:

- Focus on Urban Areas and Public Transport Corridors and Hubs
- Focus on Urban Areas and UK Central Hub and High Speed 2 Interchange area
- Focus on Urban Areas and Urban Extensions
- Focus on Urban Areas, New Settlements and significant expansion of Rural Settlements
- Combination of spatial approaches

These were assessed in the context of three strategic growth options, which tested meeting local housing needs only (12,905 dwellings); meeting local housing needs plus contribution to unmet needs (14,905 dwellings); and meeting local housing needs plus larger contribution to unmet needs (16,905

dwellings). The Council's preferred strategy at that time reflected the provision of 14,905 dwellings based on a combination of the spatial approaches, reflecting the availability of land and the opportunities offered by the UK Central Hub. The preferred growth option of 14,905 dwellings was selected on the basis that it provided for an element of unmet needs. The additional negative environmental effects of growth for 16,905 dwellings were not considered to be sufficiently outweighed by the additional positive regeneration and social benefits and this growth option was therefore rejected.

Following the publication of further evidence related to local housing needs and the wider housing market area unmet needs, the draft SLP has been informed by a series of updated reasonable alternatives for testing and selecting the preferred strategic approach (SA, 2020 paragraphs 5.1.1-3). This tests a series of revised strategic growth options based upon several potential housing distribution options, resulting in 13 reasonable alternatives for housing growth and distribution (SA, Table 5.3). It tests growth options of 13,000 dwellings; 15,000 dwellings; 16,000 dwellings; 19,000 dwellings; 22,000 dwellings; and 25,000 dwellings based upon a series of differing spatial options. In section 5.6 of the SA, the outline reasons for the preferred spatial growth strategy are detailed. The selected preferred option correlates with Option 2a to cater for 15,017 dwellings which utilises the sites identified within the draft SLP (including Green Belt) and increases growth at UK Central Hub. It is based upon developing the potential of each part of the Borough to contribute to the growth agenda, which involves:

- realising the full potential of the UK Central Solihull Area to drive growth;
- recognising the needs and growth potential of all communities in the Borough;
- balancing the need for growth with the importance of protecting character and distinctiveness; and
- recognising the importance of the Green Belt, especially the strategically important parts in the Borough.

At paragraph 5.6.4 of the SA it states that the SA sets out the potential adverse consequences of growth over and above the chosen level. However, we would note that the SA also states at paragraph 5.5.13 in relation to Option 3 (to cater for 16,000 dwellings, using additional Green Belt 'Amber Sites' alongside growth at additional options namely UK Central, Land at A45 and Land at Balsall Common) **"at this scale of growth, the effects are very similar to the corresponding options under scenario 2. The additional 1,000 dwellings involved should therefore be possible to accommodate without generating further significant effects that would not arise under scenario 2."** It is therefore unclear why the selected preferred option is Option 2a and additional growth has not been accommodated e.g. via use of the 'Amber Sites' for Green Belt release. This is particularly pertinent given the issues around supply we raise later. We would also note that under all the Options where the UK Central Hub (NEC site) is identified as part of the supply it is for 1,500 dwellings, including for Option 2a - the apparent preferred option. Within the draft SLP (paragraph 89) it identifies that the capacity for the NEC site will be for 2,240 dwellings. This does not appear to be consistent.

The SA commentary (paragraphs 5.5.14-24) notes the relatively more significant negative effects arising from additional growth options i.e. from Option 4 (19,000 dwellings) and above. We would note that this does not take into account any mitigation measures and it does not test any reasonable alternative spatial options which could include additional Green Belt release in accordance with the spatial strategy. We consider that there is also scope for additional reasonable alternative growth options to be identified that lie within the Option 3 (16,000 dwellings) and Option 4 (19,000 dwellings), particularly given the relatively minimal negative effects arising from the increase in Option 2 (15,000 dwellings) to Option 3 (16,000 dwellings). These 'interim' higher growth options could be delivered via additional sustainably located Green Belt sites in accordance with the spatial strategy. Whilst the draft Local Plan (2016) previously dismissed a growth option of 16,905 dwellings, as noted above, this generated a number of positive effects and there have been new site options

submitted since 2016, albeit as we set out below there are significant issues around the site selection process.

Each spatial option for growth within the SA for the draft SLP has the 'baseline' position of 'Option 1A' which includes 13,000 dwellings from Local Plan sites and Limited Green Belt release; further site options are then added to this for additional growth (SA, paragraph 5.4.1 and Table 5.3). Under these reasonable alternatives it is noted that the capacity for 'Limited Green Belt Release' is consistently provided as 5,380 dwellings under the relevant options (this broadly correlates to the draft SLP Green Belt release allocations totalling 5,130 dwellings, but this should be clarified). The capacity for 'Amber Sites' (which also lie within the Green Belt) is also consistently tested as 500 dwellings under the relevant options (it is noted that capacity for 700 dwellings is rounded down for calculation purposes)¹. There is no capacity for further small-medium scale Green Belt site releases in accordance with the spatial strategy tested. The options for further Green Belt release via the higher growth levels tested only include additional, large scale releases at land south of the A45 and Balsall Common (both 2,500 dwellings and above). It should consider the possibility of the higher growth options (of 19,000 dwellings and above) also being delivered via additional Green Belt release sites in accordance with the spatial strategy (i.e. alternatives to the land south of A45 and Balsall Common large scale site options), given the conclusions of our assessment on housing need (see Appendix 3 / below).

The capacities for 'Limited Green Belt release' and 'Amber Sites' are based upon the Council's Site Assessment methodology which identifies sites that should and should not be allocated and gives rise to the identified Green Belt release capacity via the Local Plan allocations. We consider that this Site Assessment methodology has unduly constrained the capacity for further sustainable Green Belt release. The Draft Strategic Housing and Employment Land Availability Assessment (SHELAA, 2020, tables at paragraph 31 and 32) suggests that there is the potential capacity for additional sustainable development at Green Belt sites, with almost 16,000 dwellings being identified as 'Category 1' sites (deliverable) upon a broad assessment of suitability, availability and achievability. Whilst it is recognised that the SHELAA does not apply the Green Belt constraint or fully apply other considerations such as landscape impacts and the overall strategy for development, it would seem that the subsequent Site Assessment approach by SBC has unduly constrained the capacity for additional sustainable growth within the Green Belt. Inconsistencies in the Site Assessment approach may also have given rise to sustainable sites not being considered for allocation. Our comments below in relation to the Site Selection Assessment process are of importance in this regard. In the context of the 'dispersed spatial strategy' we therefore consider that there is scope for further housing growth via Green Belt sites that correlate with the initial strategic Options F (Limited expansion of rural settlements/villages) and Options G (Significant expansion of rural settlements). Some Green Belt site options could also be dually considered under initial strategic Option A (around public transport corridors) e.g. at Dorridge and Hampton-in-Arden related to railway stations. This alternative approach of using further small-medium scale Green Belt release sites could potentially deliver more sustainable outcomes for higher levels of growth.

Based upon the draft SLP allocations² the extent to which the spatial strategy is being applied consistently is questionable and we consider there is the potential for further growth to be accommodated at the rural settlements identified as suitable for development. For instance, at the spatial strategy diagram (paragraph 70 of the draft SLP) the settlements of Balsall Common, Dickens Heath and Knowle, Dorridge and Bentley Heath are all identified for 'significant expansion'. Within the respective Settlement Chapters, the draft SLP identifies that Balsall Common is home to around

¹ It is noted that whilst the text in Table 5.3 for Options 2a-c does not include 'Amber Sites' the corresponding map for Option 2b(i) does include the sites. These are only included within the text from Options 3 onwards in Table 5.3. This should be clarified.

² It is noted that the draft SLP does not provide a breakdown of the overall housing land supply for each settlement e.g. taking account of existing planning permissions and windfall supply. This commentary is therefore based upon the capacity identified within the Settlement Chapters related primarily to site allocations and 'other sites' where provided.

4,000 households and it is to accommodate around 1,700 new dwellings (a 42.5% increase) via the draft SLP allocations. In contrast, Knowle, Dorridge and Bentley Heath is home to around 8,000 households and is only due to accommodate 800 new dwellings (a 10% increase). Despite both settlements having a significant level of services and facilities, as well as train stations, there does not appear to be a reasoned distinction why Balsall Common can accommodate over twice as many dwellings as Knowle, Dorridge and Bentley Heath, despite being half the size. Within the Draft Local Plan Supplementary Consultation in 2019, the Council proposed up to 950 dwellings in Knowle and Dorridge, without the Amber Sites. This was tested through the Council's Knowle Transport Study October 2020. The addition of 340 dwellings at our Client's site would not cause any in principle issues here given there are two accesses and traffic would be dispersed across the network.

It is noted that under the Spatial Strategy section no settlement hierarchy is specified which sets out the relative sustainability credentials and growth potential of individual settlements within the Borough. Whilst commentary is provided on the relative sustainability credentials of each settlement within the 'Settlement Chapters' a more clear and explicit settlement hierarchy should be added to reflect the Council's approach set out in the Overall Approach Topic Paper. As detailed above, this identified areas of opportunity for further growth and omitted settlements which were not consider suitable. This would assist in the directing of further growth to the most appropriate rural settlements. For instance, Knowle, Dorridge and Bentley Heath and Balsall Common are identified as the two main rural settlements which have the full range of services and facilities, with the potential to accommodate growth in excess of their own local needs (draft SLP paragraphs 521 and 688). Accessibility, including settlements with railway stations, is central the spatial strategy, as noted at paragraph 65 of the draft SLP, which seeks to focus significant developments in areas "located adjacent to the urban edge/a highly accessible settlement".

The draft SLP (paragraph 33) notes that around two-thirds of Solihull's 17,800 hectares is designated Green Belt. The supporting text to the spatial strategy and draft SLP Policy 17 'Countryside and Green Belts' identifies the exceptional circumstances that exist at the strategic level to justify the release of Green Belt. These are reiterated in the Overall Approach Topic Paper. This is in accordance with the NPPF, paragraph 137 and case law, namely that of *Calverton Parish Council v Greater Nottingham Councils* [2015] EWHC 1078 (Admin). We concur with the view of SBC that exceptional circumstances exist at the strategic level to justify the release of Green Belt sites to meeting housing needs. However, as outlined above we believe that the exceptional circumstances demonstrated warrant release of additional Green Belt sites to deliver sustainable development overall.

Paragraph 138 of the NPPF states that **"when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account"**. The principle that sustainable development should be of paramount importance has been reinforced by the findings of Local Plan examinations. Most recently a High Court judgement (*Compton Parish Council & Ors v Guildford Borough Council & Anor* [2019] EWHC 3242 (Admin) (04 December 2019)) in relation to the Guildford Local Plan (2019) identifies that 'exceptional circumstances' for the release of Green Belt land in relation to the meeting of housing needs can take into account the nature and degree of the need, alongside considerations of why the need cannot be met in sequentially preferable sites; the impact on the functioning of the Green Belt; and what other advantages sites released from the Green Belt might bring, for example, in terms of a sound spatial distribution strategy.

NPPF paragraph 138 acknowledges that when Green Belt release is necessary, "plans should give first consideration to land which has been previously-developed and/or is well-served by public transport". The Council's evidence suggests a limited availability of previously developed land. Whilst the spatial strategy reflects the need to prioritise sustainable locations, this does not appear to have been followed through in the site selection process.

Whilst identifying the need for Green Belt release now to meet needs, the draft SLP does not seek to consider the longer-term permanence of the Green Belt boundaries beyond the plan period as per the NPPF (paragraph 139 (e)). In view of the geography of the Borough and its continued growth requirements it is considered unrealistic to assume that further Green Belt release will not be necessary beyond the plan period. This is also relevant given that the draft SLP does not provide any flexibility in the housing land supply to meet wider housing market area needs beyond 2031 (discussed further below under Policy P5 housing requirements). The draft SLP should therefore identify safeguarded land in the context of ensuring longer-term development needs are met and that the Green Belt boundaries will not need to be altered at the end of the plan period. This safeguarded land should be identified in accordance with the spatial strategy.

Recommended changes to Vision and Spatial Strategy

The following changes should be considered to ensure the draft SLP is justified, effective and consistent with national planning policy:

- The Vision should refer to the 'protection of the remaining Green Belt (which contains the strategically important Meriden Gap) as necessary alongside sustainable growth...'
- As detailed in our response to Policy P5, the level of housing growth is insufficient in terms of its contribution towards wider unmet needs and to deliver balanced growth alongside UK Central. Without additional numbers the Vision will not be realised. As a minimum, the growth level of 16,000 dwellings should be accommodated (requiring the use of 'Amber Sites' as part of the additional supply), which is not considered to have any significant effects over the current preferred option of 15,000 dwellings (Option 3a in the SA).
- The draft SLP should test additional reasonable alternatives for higher levels of growth (particularly for options between 16,000 and 19,000 dwellings) which includes the use of additional Green Belt site releases in accordance with the spatial strategy (over and above the current identified 'Limited Green Belt Release'). The identification of additional Green Belt sites for consideration should be based upon a reappraisal of the Site Selection process (as detailed further below). The potential for additional Green Belt release in accordance with the spatial strategy to deliver levels of growth over and above 19,000 dwellings should also be considered, as an alternative to the larger scale expansions of Balsall Common and Land South of A45 currently tested.
- The draft SLP should include an explicit settlement hierarchy within the policy to guide the direction of this additional growth, focusing on those settlements identified as appropriate for development via the spatial strategy approach to date. This should reflect the range of facilities and services available with higher priority given to those settlements with sustainable transport links, particularly railway stations.
- The draft SLP should identify safeguarded land in accordance with the spatial strategy to ensure longer term development needs are met.

Site Selection

The draft SLP (paragraphs 68-69) details that complementary to the spatial strategy is the site selection process, which in combination have resulted in the selected site allocations. The Site Selection Process Topic Paper (October 2020) sets out the process for the assessment of sites. The selection of sites for allocation has been determined by Solihull Council's Site Assessment Methodology which was the subject of comments as part of the Draft Local Plan (2016) consultation and the Draft Local Plan Supplementary Consultation (2019). The site selection methodology is split into two steps: firstly, using a site hierarchy based approach; and secondly by using planning judgement to refine site selections.

The first step related to the site hierarchy rates sites as 'red' (no allocation), 'blue' (unlikely allocation), 'yellow' (potential allocation) and 'green' (allocation). The site hierarchy scores a site according to its location, land use status and Green Belt designation. For instance, sites that are

brownfield within an urban area or settlement receive the highest priority whilst sites that are greenfield in an isolated highly performing Green Belt location receive the lowest priority.

The second step of the process then takes into account other considerations to give a finer grain analysis of the sites. This refines the starting position established by the first step above to give an updated assessment of a site. Sites are categorised as 'green' (to be allocated in the plan - this will mean the site has no or only low impact on the relevant considerations) or 'red' (not allocated and considered to have severe or widespread impacts not outweighed by the benefits). Considerations included are environmental constraints, landscape capacity, accessibility, SA harmful impacts, whether a strong defensible Green Belt boundary would be breached or could be created, as well as planning gains and whether the site would be in accordance with the spatial strategy (in terms of being a proportionate addition to the settlement). Evidence used to inform the judgements includes the SHEELA categorisation (2016 and draft 2020); the Accessibility Study (2016, 2019, 2020); the Green Belt Assessment (2016); Landscape Character Assessment; Constraints Mapping (e.g. flood zones and ecological destinations); and the Sustainability Appraisal Site Assessments (2016 and 2020). We would note that the Site Assessment Methodology does not include the Heritage Assessments evidence base. For the purposes of the Draft Supplementary Local Plan consultation (2019) some sites were categorised as 'amber' i.e. they were less harmful than 'red' sites and SBC sought further comments on them to establish whether or not they should be included in the draft SLP. The detailed Site Assessments (October 2020) are published alongside the draft SLP.

We consider that the draft SLP is unsound as the site selection process underpinning it is not fully justified. We have concerns with the application of the Site Assessment methodology in terms of its transparency and consistency. This gives rise to a wider concern that some Green Belt sites rated 'blue' (unlikely allocation) or 'yellow' (potential allocation) have been rejected unjustifiably and the capacity for further Green Belt release in accordance with the spatial strategy has been unduly constrained. These issues related to transparency and consistency are demonstrated by the approach taken to both unallocated and allocated sites.

Our Client's site at Oak Farm, Dorridge is located within Site Reference 413 in the Site Assessment document (a slightly larger site area is assessed within the Site Assessment than that proposed within the Vision Highlights document – this should be rectified for the reasons set out below. The correct site boundary is as per Appendix 2). In terms of step 1 the site is scored 5, rated 'yellow' (potential allocation) on the basis of it being located with a lower performing Green Belt parcel in an accessible location. Some constraints are identified including proximity to a listed building, locally listed buildings and part of the site to north-east is a local wildlife site (with some habitats of wildlife interest also present) – we address these matters below. In the commentary, the assessment conclusion notes:

"The site lies adjacent to the settlement in a lower performing parcel of Green Belt. If considered in the context of the proposed allocation at Arden Triangle (Site 9) and the surrounding land promoted for development (site ref 104 and 109), this site could form part of a wider area, well related to the settlement that is well contained by physical features to establish a defensible Green Belt boundary. The site has high overall accessibility and is in an area with medium landscape character sensitivity, medium landscape value and an overall low landscape capacity to accommodate new development. The SA identifies mainly neutral effects, with 1 negative and 3 positive effects, including housing deliverability within 10 years as a significant positive."

The site then however goes on to be rated 'red' and is not recommended for allocation. It is not clear from this commentary on what grounds the site has been rejected for allocation at this stage, particularly given that the proposed allocation at Arden Triangle referenced in the commentary is included within the draft SLP (allocation KN2).

There are also some inconsistencies between the different evidence base documents used to inform the Site Selection process. Within the Draft SHELAA (2020) the site is categorised as 'deliverable' noting that it performs well in terms of suitability, availability and achievability. It reflects the Site Assessment constraints in terms of proximity to statutory and local listed buildings and some of the site being a Local Wildlife Site (see clarifications below). However, the SA site assessment (SA Site Reference AECOM146) commentary notes that there are no Local Wildlife Sites or habitats of local interest (giving a neutral effect). It also rates the site as 'neutral' in respect of SA12 and SA13 objectives related to heritage and townscape, noting that heritage assets are more than 100m from the site. The Site Assessment refers to the 'high accessibility' of the site based upon the Accessibility Study, noting for example that access to primary schools is 'high'. In contrast the SA assessment provides 'neutral effects' for access to schools (SA2 objective) and jobs and services (SA19 objective). Whilst it is recognised that each assessment uses its own baseline and criteria to compare sites, these differing conclusions between the assessments gives rise to concerns about the overall consistency and transparency of the site selection process. It is also noted that the Site Assessment commentary does not appear to reflect the most up to date SA commentary i.e. in terms of the number of effects and whether these are positive or negative.

This lack of consistency also makes it difficult to judge why some sites have been selected for allocation and others have not. In relation to Knowle, Dorridge and Bentley Heath it is noted that the site allocation KN1 Hampton Road the policy text references the importance of the setting of Grade I Listed Building Grimshaw Hall. However, the Site Assessment proforma and commentary for this site (constitutes site references 166 and 213) do not note the proximity of a listed building within the 'hard constraints'; the potential for impacts on a Grade I listed building are only noted briefly within the concluding commentary for site 213. The SA appraisal (site reference AECOM 91) also provides a 'neutral' effect for SA12 objective related to historic assets (although it is recognised that the SA criteria give rise to this effect i.e. only applies to sites within 100m of a site, which Grimshaw Hall is located just on the edge of). The commentary text is also 'cut-off' which means the full conclusion in relation to site 213 is not available. This site was rated as 'blue' in the step 1 process (unlikely allocation) by virtue of its moderate/higher performing Green Belt function. Clearly, the draft SLP has therefore considered that other benefits outweigh the impact upon the Green Belt for this site. However, in comparing the conclusions to allocate this site and not allocate the former 'amber' site at Oak Farm (Site reference 413) which was rated more preferably as 'yellow' (potential allocation), the step 1 process is not transparent as to why site 213 in particular is considered appropriate for allocation and 413 is not. On balance they are comparable in terms of factors related to landscape and accessibility in particular. Whilst the policy for KN1 refers to the re-provision of upgraded sports facilities, it is not clear whether this is re-provision or over-provision, which could be considered a planning gain that weighs in favour of allocation. This is not referenced within the Site Assessment commentary so it is difficult to understand the reasoning (we consider the need for relocated sports pitches actually introduces risks around delivery, see below). More clarity is required to understand the site selection process, as the benefits for a site such as KN1 can be replicated on our Client's site, which is larger, less constrained and therefore more capable of delivering the benefits which justify the loss of Green Belt land.

We note that in the case of the ongoing Examination of the Central Bedfordshire Local Plan, in the Inspector's Post-hearing letter (30th September 2019) to the Council issues regarding consistency between the assessments undertaken within the SA and other technical documents has given rise to concerns on the robustness and objectivity of the process. We consider that there is a lack of consistency and transparency in the draft SLP site selection process which makes it difficult to justify why some sites have been selected for allocation and others have not. This could have inevitably

led to Green Belt sites rated as 'yellow' (potential allocation) and 'blue' (unlikely allocation) in the step 1 of the site selection process then being unjustifiably rated as 'red' (no allocation) in the step 2 of the site selection process, therefore reducing the true potential capacity of the draft SLP to deliver further sustainable growth via additional Green Belt release.

It is not always clear from the relatively short commentaries within the Site Assessments what factors have been given greater weight in the site selection decision making process and the degree to which the ability for sites to mitigate adverse effects has been taken into account consistently. For instance, in relation to proposed site allocation BL2 (site reference 122 within the Site Assessment document) the supporting justification text within the draft SLP notes that there is no clear defensible Green Belt boundary to the site; this will need to be provided as part of the site design. This would weigh against the site according to the Site Assessment methodology where the site is rated as 'blue' – 'unlikely allocation' in the step 1 of the site selection process. However, a number of Green Belt sites within the Site Assessment appear to be partly rejected on the basis of lack of defensible boundaries, without any reference to potential mitigation measures. It is noted from the Site Assessment commentary (site 122) that this site also lies within a landscape area of high sensitivity and has varying levels of high-low accessibility. Whilst the commentary for the site is 'cut-off' it appears that reference to the potential benefits such as a primary school and improved public transport have then weighed in its favour. It is not clear why such mitigation measures could not be considered for other sites with similar characteristics (albeit noting that scale of development may impact upon this).

In relation to site allocation BC4, the supporting justification at paragraph 563 of the draft SLP states that the site scores poorly in the SA with twice as many negative effects than positive but that this can be mitigated with enhanced green infrastructure and amenity. In the Site Assessment (site references 170 and 320) the commentary notes the low accessibility and partly higher performing Green Belt function of the site and indefensible boundaries which would need to be addressed. All of these factors weigh against the site in terms of the Site Assessment methodology. It identifies the settlement of Balsall Common is identified for significant growth and the site is part brownfield in favour of the site selection, however it is not clear why the mitigation measures considered appropriate to allocate this site (e.g. defensible boundaries and accessibility measures) could not also be considered appropriate for other sites that have been apparently rejected on such grounds.

In relation to site allocation BL3, in the Site Assessment (site reference 41, which is rated as 'blue' – 'unlikely allocation' in step 1 of the site selection process) it is noted that the Landscape Character and Visual Sensitivity are both High with a 'Very Low' landscape capacity to accommodate change. This weighs against the site according to the Site Assessment methodology. However, this factor is not referenced within the commentary on the conclusions for the site. Again, a number of other site commentaries within the Site Assessment appear to refer to the landscape sensitivity as a factor in the rejection for allocation. The commentary within the Site Assessment suggests that the accessibility of the site outweighs other factors (including the high-moderate Green Belt performance). The draft SLP policy text refers to a number of features to mitigate landscape and Green Belt impacts. Again, it is not clear why other sites with similar characteristics (or indeed those located within less landscape sensitive and lower performing Green Belt area) could not also come forward with appropriate mitigation measures.

The site selection process is not therefore considered to be sufficiently objective, transparent or consistent in its consideration of different factors which have influenced the decision-making process and mitigation measures. It is recognised that the spatial strategy – in terms of identifying different rural settlements for no growth, 'limited' or 'significant' growth – has been applied alongside the site selection process in terms of rejecting sites that are not considered 'proportionate' additions to settlements. However, this should not unduly constrain the potential for otherwise sustainable sites to contribute to additional sustainable growth where revised site sizes or capacities can be considered to ensure growth is proportionate (as referenced in the Site Selection Topic Paper at footnote 11) or

wider planning gains can be provided (as referenced in the Site Selection Topic Paper under 'Factors in Favour').

In the context of the above examples, it is particularly difficult to understand why a site such as Oak Farm (site reference 413), which is identified as lying within a lower performing Green Belt parcel with defensible boundaries, in a landscape of medium sensitivity, with high accessibility, no significant constraints, and performs comparatively well in SA terms (mainly neutral effects) has not come forward for allocation. More so when taking into account the ability to mitigate for any adverse impacts identified (as outlined within the supporting Vision Highlights document), as has been the case for some of the selected site allocations. The Site Assessment commentary notes that the site would align with the spatial strategy Growth Option G: Significant Expansion of Rural Villages (based on a capacity for 600 dwellings). However, it could also be considered under Growth Option F: Limited Expansion of Rural Villages based on the Vision Highlights document capacity for around 340 dwellings).

There are some sites which have been assessed within the SHELLA 2020 Update (others are not, and there are inconsistencies between the 2016/18 versions, which adds to the confusion around the site assessment process). For the avoidance of doubt, we provide the following comments / clarifications to the Council's latest assessment of our Client's site at Oak Farm (SHELAA 2020 Update, reference 413):

- As above, the Council's assessment uses an incorrect site area as well as assuming a substantially larger capacity. This should be amended to 24.20 hectares with a capacity of around 340 dwellings as set out in the Vision Highlights document at Appendix 1.
- The site is identified as performing well in terms of its suitability, availability and achievability. We agree.
- Access Infrastructure is scored 3 with a comment "Existing road access requires upgrading" – discussions between our Client and the Highway Authority have not indicated any in-principle technical constraints or viability concerns with delivering the expected off-site improvements. We consider this should score 5. It should also acknowledge the highly accessible nature of the site in relation to walking distance to the railway station.
- BMV Agricultural Land is scored 3, commenting that the site is Grade 3 land – the previous SHELAA (errata 2018) scores the site (reference 104) a 5, specifying that the land is Grade 5. This does not appear to be correct, although the draft allocations are also assessed as Grade 5 land. It is not clear whether the land is best and most versatile, but regardless of this, there are no other non-Grade 3 options for significant growth around the settlement. As such, this score is neutral.
- Heritage is scored 4, with a comment that the "site abuts or is adjacent to a Nationally or Locally Listed Building" – there is a statutory listed building to the east, adjacent to the proposed Country Park. The statutory listed building to the north on Grove Road has been considered as part of the masterplanning work. Neither are considered to be a constraint to development and the Council's assessment should acknowledge this by scoring this 5. In terms of consistency, the 2018 SHELLA scored the site a 5 for heritage, as it did for Arden Triangle (reference 1010), which will have the same potential impact on the significance of the listed building at Grove Road. Consistency is needed.
- Biodiversity is scored 3 due to "Less than 10 per cent of the site is within a Local Wildlife Site" – this is not correct. The LWS is outside of the site and is adjacent to the Country Park, where no housing is proposed. The Council's assessment should be updated with the correct red line as per Appendix 2. This should be amended to score 5 (as was the case with the 2018 SHELLA). Extracts are shown below from the Appendix 1 and the Warwickshire, Coventry and Solihull Green Infrastructure Map.



- Suitability of Location is scored 3 as the "Site is within or adjacent to a 'free standing rural village'" – this is not consistent with the spatial strategy, which encourages sites adjacent to urban edge/a highly accessible settlement (paragraph 65). The SHELLA's approach does not distinguish between sustainable and unsustainable rural settlements. Given this, a score of 5 is justified.

It appears that some sites have not been considered within the SA as reasonable alternatives without an explanation as to why. For instance, at the Draft Local Plan Supplementary Consultation (2019) 'amber site' reference A1 was consulted upon as part of the consideration for further site options (identified in step 1 of the site selection process at 'likely allocation'). However, the Site Assessment document (site reference 345) states that the SA does not assess the site. Therefore, the SA could not have informed the overall conclusions of the Site Assessment process (which for this site concludes it is 'red' – no allocation).

It is also noted at Section 7.2 of the SA provides 'outline reasons' for the selection of proposed housing sites at the plan level, however the SA does not provide any outline reasons for individual sites in terms of why they have or have not been selected for allocation. This is not considered to be fully in accordance with the Strategic Environmental Assessment Regulation h) which requires an 'outline of the reasons for selecting the alternatives dealt with'.

Recommended changes to Site Selection

We consider that the following changes are required to ensure the draft SLP allocations are justified in terms of the site selection methodology:

- The draft SLP Site Selection process should be reviewed for consistency and transparency to provide a justified evidence base for the draft SLP. We consider this would give rise to the conclusion that further Green Belt sites are suitable for allocation in accordance with the spatial strategy.
- The draft SLP Site Selection process should be more fully justified by consistently considering the potential for mitigation measures in the assessment of sites, potentially enabling the identification of further Green Belt sites that are suitable for allocation in accordance with the spatial strategy.

We also have the following comments on a number of specific allocations:

Policy KN1: Hampton Road, Knowle

We support the principle of the allocation given the spatial strategy and sustainability of the settlement. However we query whether 180 dwellings could be delivered given the extent of constraints, including heritage (particularly the Grade I listed Grimshaw Hall), heritage and ecology. Our own masterplanning work suggest a capacity in the region of 124 dwellings (30dph) to 165 dwellings (40dph).

In addition, the proposed Green Belt boundary (which is not well defined or permanent) does not include the proposed Sports Hub, meaning it would rely on very special circumstances being demonstrated for its delivery, given the built form including pavilion, plus likely floodlighting etc. This is not appropriate. If mitigation is required to offset the loss of pitches, its deliverability should be assessed and agreed at the allocation stage – this is especially an issue given Sport England will resist the loss of any pitches and will want to see early delivery. We also query whether the Sports Hub is there to simply offset the loss of sports pitches or provide replacement provision for other sites in addition to this (other sites may have to contribute and this will need to be tested). The draft SLP is generally unclear on the Sports Hubs and we provide further comment separately below.

Criteria 5 of the policy requires a financial contribution towards the new all through school of KN2. However as set out below this has not been tested within the Viability Study, nor does it appear to have tested the delivery of the Sports Hub. The ability for this site to be delivered, let alone with a full policy-compliant affordable housing provision, has not been demonstrated.

Recommended change to KN1

A full assessment of the site's obligations and requirements should be undertaken and this should allow for sensitivity testing for a potentially lower number of dwellings given the site's constraints.

Policy KN2: South of Knowle (Arden Triangle)

Whilst we support the principle of the allocation, we have significant concerns that the level of growth identified (600 homes) is not deliverable. The draft allocation is dependent on relocation of the school. Delivering an all through school will require significant capital cost, which we assume will be in excess of £30m. However the item is not listed within the 2020 Infrastructure Delivery Plan (IDP), let alone the cost. It only states at page 79 that 420 primary school places will be required in Knowle and Dorridge. If the new school will be part funded by developer contributions and other sources such as central government, this should be made clear as this will be key to establishing that the school and therefore housing is deliverable. The Council should assess this through its Viability Study in order to determine whether the site can be delivered at all, let alone with a policy-compliant affordable housing provision. We have assumed it has not been assessed as the Viability Study suggests only two sites in Balsall Common have included an allowance of £3,500 per dwelling for secondary education (paragraph 3.5.3). This potential £30m is a significant cost for the allocations totalling just 780 in Knowle and Dorridge to deliver, even without other infrastructure requirements. The viability testing should account for the expected phasing of development and timing of any infrastructure, for instance whether the school needs to be developed before the existing school land is released for housing. This has potentially significant implications for cashflow. Aside from CIL and Highways, other infrastructure requirements need to include biodiversity offsetting (we would query whether this can be delivered on-site or whether off-site improvements are required; the cost of this should be factored in); contributions towards local sports provision (on or off-site); and Green Belt compensatory measures (NPPF paragraph 138), given the importance put on this through draft SLP Policy 17A.

As we have identified, additional housing growth here would be justified from the perspective of the spatial strategy, and our Client's site can assist with the school's costs.

The site also has a number of landowners which could affect assembly and deliverability. We question whether adequate evidence is submitted to demonstrate availability and therefore deliverability. This is in contrast to our Client's site which is in single ownership and available now.

Recommended change to KN2

A full assessment of the site's availability, obligations and requirements should be undertaken, particularly around the deliverability of the new all through school. It is likely additional sites will be needed to help fund this, and our Client's land can assist. This should be reflected in the IDP and Viability Study.

Balsall Common sites, including Policies BC1, BC2, BC3, BC4, BC5, BC6

As noted above, we have particular concerns around the level of growth directed to Balsall Common compared to Knowle and Dorridge. The level of growth proposed in Balsall Common, including from HS2, will necessitate a relief road. Paragraph 529 of the draft SLP suggests early delivery of this is needed, and this is reflected in Policy BC1 which states provision in the first phase of development. We question the evidence around its deliverability, and therefore the deliverability of the large housing allocations that rely on it.

The cost of the road is estimated at £20m to £30m within the IDP, with timescales of delivery at 2022-2025.

This appears very optimistic given it relies on a number of landowners (even just considering the development sites themselves, let alone third party land, dwellings and businesses which may be affected). Detailed design and land assembly will take some time (assuming CPO is not required). There are large development sites (e.g. BC1) that will be required to invest significant amounts of money on this infrastructure before large numbers of houses are sold – this raises clear issues around cash flow. The Viability Study does not specifically mention the relief road, bypass or any additional infrastructure costs for Balsall Common besides secondary school contributions. This brings into question the robustness of the Viability Study, and a more focused approach is needed for each large allocation to demonstrate deliverability. Even if as the IDP suggests sources of funding may be available, e.g. government, regional and LEP sources, there is no evidence to suggest this is forthcoming. It is telling that the 'Any dependencies / risks' column is left blank at page 120. The potential inability to deliver this relief road presents a huge issue for the draft SLP.

The Council's own evidence base appears to question whether this is the appropriate location for a relief road. The Balsall Common Transport Study Optioneering notes issues around flooding, overhead power lines, the proximity of the West Coast Main Line, HS2, open space, trees, SSSI, and a number of significant businesses and properties within the route option path (11 are listed at page 26). We query whether the estimated cost of the road has taken these matters into account. The cost will be significant given part of which will run through Flood Zones 2 and 3. This will necessitate a free spanning river crossing to avoid conflict with the Level 2 Strategic Flood Risk Assessment (draft SLP paragraph 549). The Transport Study Optioneering report suggests that the western route for the bypass should also be considered, however it is not clear from the SA that this has been explored as a reasonable alternative for growth in the draft SLP.

Recommended change to Policies BC1, BC2, BC3, BC4, BC5, BC6

There is insignificant evidence to justify housing allocations which are reliant on a road which is not demonstrably deliverable. The SA should be exploring alternative options, including elsewhere in Balsall Common; or more preferably the delivery of additional growth at other sustainable settlements such as Dorridge. The allocations should be revised to refer to updated, robust evidence around the infrastructure requirements and deliverability; otherwise they should be deleted.

Sports Hubs

The draft SLP suggests that new Sports Hubs are required in five locations across the Borough to deal with replacement / new provision. The draft SLP is unclear on the precise location and deliverability of this mitigation. It is assumed (and for some of the locations stated) that the new hubs will be on Green Belt land. This is often unspecified (e.g. Policy BL1: "Relocation of the existing sports provision south of Tythe Barn Lane to a suitable site in the vicinity"). It is not clear whether the land is available to deliver these hubs, or the cost and timing of when they will be delivered. It is also implied that in some instances very special circumstances will be required at the application stage (e.g. Policy KN1). We object to this approach for the Sports Hubs. The draft SLP should clearly state what mitigation is required and how it can be delivered, with support from the evidence base – for instance transport, Green Belt, landscape, viability. It cannot be considered an afterthought. If as suggested, a deliverable Sports Hub is required in Dorridge, our Client's site could assist via financial contribution as required.

Policy P4D - Meeting Housing Needs - Self and Custom Housebuilding

This Policy requires developments of allocated sites of 100 dwellings or more to provide 5% of open market dwellings in the form of Self and Custom Build Plots, taking into account a range of factors. Plots should be offered on the market for a 12-month period. **The policy requirement is considered unsound as it is not justified, effective or consistent with national planning policy.**

This places the burden for delivery of self and custom build housing on developers, in particular those of sites of 100 dwellings or more only, and goes beyond the PPG which seeks local authorities to "engage" with landowners and "encourage" them to consider self-build and custom housebuilding (then facilitating this where the landowner is interested) (Paragraph: 025 Reference ID: 57-025-201760728). The supporting HEDNA (2020, paragraph 10.33) identifies that the Council could take an 'encouragement' approach alongside a policy requirement for strategic sites. It identifies that on the basis of the current Self Build Register, SBC should be seeking to deliver 116 plots per annum. However, we consider that over-reliance upon the Register should be cautioned against in justifying any policy percentage requirement, particularly given the criteria for expressing an interest are relatively limited i.e. whilst an individual may express an interest the degree to which this is a realistic ambition cannot be determined.

Suggested changes to Policy P4D

We consider that the following changes are required to the draft SLP to ensure it is positively prepared, justified, effective and consistent with national planning policy:

- The requirement to provide 5% on allocated sites of 100 dwellings or more should be replaced with an 'encouragement' to provide self-build on allocated sites of 100 dwellings or more having regard to the latest robust evidence.
- Point 2 of the policy should also be clear that after the marketing period (which should be less than 12 months), any unsold plots should revert back to the original developer.

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

We query whether the evidence base supporting this policy and its requirements is robust, including around viability and deliverability. The Viability Study makes reference to P4d being included in Round 2 testing, but not P4e. This has the potential to undermine delivery of much needed housing and affordable housing. Whilst specialist housing may be appropriate on some sites, this should be tested. Additional sites to deliver this specific need may need to be explored if supported by evidence.

Suggested changes to Policy P4E

Revise policy, with reference to supporting evidence, to ensure deliverability of development sites is not affected by the requirements of the policy.

Policy P5 - Provision of Land for Housing (Housing Requirements)

Point 1 of Policy P5 identifies that 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 plan period (2020-2036). The setting of this housing requirement for the plan area is in line with the NPPF (paragraph 65).

We consider that Policy P5 of the draft SLP is unsound in respect of the housing requirement identified. It does not represent a positively prepared strategy; it is not justified; it is not effective; and it is not consistent with national policy. We have a number of concerns in relation to the identified requirement as detailed further below and supported by our commentary within Appendix 3 - Housing Technical Note.

Economic growth uplift: The supporting text to Policy P5 sets out the Local Housing Need figure as at 1st April 2020. This equates to 807 dwellings per annum, resulting in a total of 12,912 dwellings for the Plan period. The draft SLP, at paragraph 221, recognises (in line with the NPPF, paragraph 60 and the PPG section on 'Housing and Economic Needs Assessment') that the Local Housing Need Figure is a minimum and a series of other factors, including the need to reflect economic growth, should be taken into account. As a result, the supporting Housing and Economic Development Needs Assessment (HEDNA, 2020) considered the need for any uplift to this minimum requirement, primarily related to the UK Central Hub growth. The draft SLP (paragraph 221) states that the HEDNA has considered whether the UK Central Hub proposals represent a deliverable growth strategy that is likely to exceed past trends. It was concluded that this was the case; the need for additional workforce has therefore been considered. This concludes that a slight uplift to 816 dwellings per annum is justified, totalling 13,056 dwellings over the Plan period (a total of 144 dwellings). This figure is predicated on the assumptions that the standard methodology provides for higher jobs growth than baseline predictions indicate are necessary and on employment commuter patterns for the UK Central Hub area remaining at 2011 Census levels.

Paragraphs 31- 32 of the draft SLP recognises the strength of economic growth in the Borough and states:

"the regional and national impact and role of Solihull's strategic economic assets is significant. Solihull's economy produces goods and services valued at £7.5(bn)(GVA) and supports around 109,000 jobs. With an estimated 61.5% of the Borough's workforce commuting in, it plays a vital role in the regional economy and labour market."

Furthermore, at paragraph 72 of the draft SLP it recognises that 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 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."

In this context it is imperative that sufficient homes are provided to support the envisaged economic growth. A review of the evidence base supporting the draft SLP, namely the Housing and Economic

Development Needs Assessment (HEDNA, October 2020) is provided within Section 4 of our Housing Technical Note. In summary, whilst we agree with most of the assumptions used in determining the economic-led housing need for the draft SLP we consider that an additional scenario to test the UK Central Hub growth scenario (22,998 jobs) is required to determine how many homes might be required in Solihull if all jobs are filled by residents of Solihull. The HEDNA at present runs just one scenario for the UK Central Hub job growth based on a growth of only 13,250 jobs in Solihull (of the total 22,998 jobs generated by UK Central Hub) resulting in the 816 dwellings per annum requirement. However, this means that the housing need generated by the additional 9,750 jobs would be generated in neighbouring authorities. This is said by the HEDNA to 'aid' duty to cooperate discussions, but there is no guarantee neighbouring authorities will be agreeable to this approach. It is important to understand how many homes would be required in the Borough if all the jobs are taken up by Solihull residents.

Table 36 of the HEDNA shows how 'Growth A' scenario (an increase on baseline jobs growth but excluding UK Central Hub growth) would require 908 dwellings per annum in the Borough based on the 2011 commuting ratio; a significant increase to the 816 dwellings per annum recommended. However, the HEDNA does not test the outcome of the UK Central Hub scenario in the same way. We consider that this is an omission, and such a scenario should be tested. We provide this within Section 5 of the Housing Technical Note, where we consider a range of demographic forecasting scenarios which sensitivity test the result of the HEDNA.

A number of key conclusions arise from this sensitivity testing. Firstly, based upon a consideration of historic job growth we agree that the level of job growth for UK Central Hub identified by the HEDNA (totalling 22,998 jobs) is a realistic and reasonable projection. We note that a reasonable mid-point of the scenarios tested (at Tables 5.1 and 5.2 of the Housing Technical Note) would suggest that the minimum local housing need (as determined by the standard methodology) of 807 dwellings per annum would only support approximately 14,500-15,000 jobs over the Plan period. This falls short of the 22,998 jobs required to support UK Central Hub growth. The HEDNA states that 816 dwellings per annum is required to achieve this job growth which we have undertaken sensitivity testing of (as set out in Tables 5.3 and 5.4 of the Housing Technical Note). Based upon this additional testing, we consider that the economic-led scenarios show a need for between 16,570 and 19,975 dwellings (2020-2036). A reasonable mid-point therefore suggests that 18,500 dwellings should be provided to deliver the envisaged jobs growth at UK Central Hub.

Unmet Housing Need: At paragraphs 227-229, the draft SLP states that the housing requirement for 15,017 dwellings includes a contribution to the unmet housing needs of the Greater Birmingham Housing Market Area (GBHMA). This is detailed as 2,105 dwellings, which is the difference between the minimum Local Housing Need of 12,912 dwellings and the identified capacity of 15,107 dwellings. The former figure is used as the baseline, rather than the economic growth uplift figure of 13,056 dwellings as it is considered that the occupation of these additional dwellings would be as a result of additional net migration into the Borough and to have added this to the HMA shortfall contribution would result in double counting.

The Policy justification acknowledges that SBC is one of fourteen local authorities within the GBHMA. It identifies the Birmingham Development Plan (BDP, 2017) shortfall of 37,900 homes to be met in the wider GBHMA up to 2031. Paragraph 228 of the draft SLP explains how the Council committed to testing the ability to accommodate 2,000 dwellings up to 2031 towards the shortfall as part of the Solihull Local Plan Review. The Council now considers that it can provide 2,105 dwellings towards the HMA shortfall, as set out above.

The Overall Approach Topic Paper details the extent of collaboration to date between the GBHMA local authorities that have been working together since the identified BDP shortfall emerged to address strategic housing matters. This has primarily been via the GBSLEP/HMA Technical Officers Group which has been the main forum for GBHMA shortfall discussions. It has overseen the

production of a Strategic Growth Study (2018) and subsequent 'Position Statements' (Feb 2018, Sept 2018 and Sept 2020) which have sought to establish and monitor progress against the GBHMA shortfall. In terms of the extent of the GBHMA shortfall, the Strategic Growth Study identified a shortfall of 28,150 dwellings³ (2011-2031) across the GBHMA against the minimum need of 207,979 dwellings (205,099 minimum GBHMA requirement plus 2,880 dwellings for Coventry and Warwickshire HMA needs to be met by North Warwickshire and Stratford Upon Avon). This had the potential to reduce by around 13,000 dwellings (to 15,150 dwellings) if additional supply from achieving higher densities was taken into account. The Position Statements continue to monitor against this minimum need and now suggest that the shortfall is reduced to around 2,597 dwellings up to 2031 based upon additional supply being identified (which includes the 2,000 dwelling contribution from SBC). We have a several concerns with the approach and consider that a higher contribution towards unmet needs is required as part of the draft SLP housing requirements.

Firstly, no further explanation is provided in the draft SLP or supporting Topic Papers as to how the level of contribution from SBC was initially derived, or the extent of agreement with other GBHMA authorities on its appropriateness. In this regard, it is noted that the supporting 'Overall Approach' Topic Paper (October 2020) contains a 'Duty to Cooperate' section which provides some further commentary on the GBHMA shortfall issue. However, the Council has not published a separate Duty to Cooperate Statement or any Statements of Common Ground to address strategic policy matters as required by the NPPF (paragraph 27). The PPG 'Maintaining Effective Cooperation' section provides guidance on the format of these statements and states these should be maintained throughout the plan production process and published with the draft Plan (Paragraph 020 ID: 61-020-20190315). Given that there are no accompanying Statements of Common Ground the extent of agreement with other local authorities on strategic issues such as the GBHMA shortfall contribution is not fully apparent. At paragraph 148 the Overall Approach Topic Paper states **"the Council is seeking to enter into Statements of Common Ground with HMA partners"** and it considers that the Position Statements published to date provide a basis for these.

However, it should be recognised that the Position Statements are effectively a monitoring tool and they do not provide explicit support for the approach of one authority or another. In the case of North Warwickshire Borough Council and its Local Plan Review (currently under Examination), for example, a Memorandum of Understanding (September 2016) has been agreed with Birmingham City Council in relation to the contribution to the HMA shortfall. We note that in response to the previous draft SLP Supplementary Consultation (2019) several of the GBHMA authorities responded to the Plan raising concerns with Solihull's suggested contribution of 2,000 dwellings. In particular, the Black Country authorities highlighted not just the Birmingham housing shortfall but those of the Black Country area too (this is referenced within the latest Position Statement as 29,260 dwellings (2019-2038)). Given that the draft SLP continues to identify a similar level of provision, the extent of agreement from the other GBHMA authorities should be detailed in full.

Secondly, it should be recognised that the GBHMA shortfall being monitored by the Position Statements is that of the overall GBHMA, as established by the Strategic Growth Study, rather than the BDP shortfall of 37,900 dwellings alone which is the only shortfall established and adopted via a Local Plan to date. At Section 6 of our Housing Technical Note (Appendix 3 to these representations) it is detailed how we consider that the shortfall against the BDP figure of unmet need (37,900 dwellings) is in fact substantially higher than the 2,597 dwellings suggested in the latest Position Statement. This is based upon the latest Local Plan position in each of the GBHMA authorities and the amount of unmet need they are proposing to deliver (Table 6.1 of the Housing Technical Note). However, it should be noted that the unmet need figures proposed in these Local Plans are not exclusively for Birmingham City and instead look to address unmet need across the GBHMA. Furthermore, several of the proposed plan periods exceed 2031. It cannot therefore be assumed

³ It is noted that this figure took into account non-implementation discounting. The Position Statements for 2018 did not include this (using the unadjusted land supply figure) but also did not take into account potential additional supply from increased densities. Hence the Position Statement baseline shortfall figure of 16,325 dwellings is slightly different to the GL Hearn estimate of 15,150 dwellings.

that the individual Local Plans will deliver their unmet need proportions by 2031 (as noted below further in relation to Lichfield and South Staffordshire Districts).

Based upon the above (and excluding any contribution from the Black Country based upon its own identified housing shortfall) we consider that the shortfall against the BDP unmet need figure is in fact **between 11,294 and 13,101 dwellings** up to 2031. This is a 'best case' scenario as it assumes all delivery will be towards the BDP unmet need, where the Black Country will also have unmet needs up to 2031. It should also be noted that since the adoption of the BDP, no Local Plan has been adopted in the GBHMA which provides for Birmingham's unmet needs; the North Warwickshire Local Plan Review has reached the most advanced stage but is not yet adopted (at Examination).

The implications of the Standard Method calculation for local housing needs (2019) should also be considered. Local Plans must now be prepared using the Standard Method, introduced by the NPPF, 2019 (post adoption of the BDP in 2017) which provides a minimum figure. As set out at Table 6.2 of the Housing Technical Note we consider that application of the Standard Method across the GBHMA (and taking into account planned housing supply from current/emerging Local Plan requirements) would result in a **minimum unmet need of 25,543 dwellings up to 2031 across the GBHMA**; if the additional capacity identified within Birmingham City since the adoption of the BDP is taken into account (around 14,300 dwellings) this results in an unmet need of between **11,243 and 13,050 dwellings up to 2031** (a very similar level to that identified above in the context of current BDP plan requirements).

However, in Birmingham City the current minimum housing need under the Standard Method is 'capped' at 3,577 dwellings per annum due to the status of the Local Plan which has been adopted within the past five years. This is despite the step 1 of the Standard Method calculation showing a need of nearly 4,538 dwellings per annum and step 2 resulting in a 12% uplift to 5,069 dwellings per annum; a 42% increase to the current 'capped' figure. Come early 2022 (five years post-adoption of the BDP) the Standard Method will therefore result in a significant increase to the minimum local housing need requirement for Birmingham City and an increase in the minimum unmet need from 25,543 dwellings identified above to **approximately 55,000 dwellings** (not taking into account any increased capacity from Birmingham City, which would reduce the figure to between 41,083 and 42,890 dwellings).

Thirdly, we have concerns with the supply identified up to 2031 at present. The most recent Position Statement (July 2020, published September 2020) sets out the updated housing land supply position for the GBHMA. However, it is noted within the Position Statement (at Table 3) that some of the capacity identified to meet the shortfall is that which is 'emerging' in Local Plans and so is not secured at this stage, including allocations in emerging plans (11,413 dwellings, primarily from SBC and North Warwickshire) and additional urban supply (sites with no planning consent or allocations totalling 19,410 dwellings, with two thirds of this in Birmingham City Council). There is also a significant proportion of windfall supply (14,111 dwellings across the GBHMA). Altogether this totals around 22% of the overall 205,382 dwellings supply identified which is not secured. In addition, it is noted that not all of the GBHMA authorities include a non-implementation discount to their supply (Table 4 of the Position Statement). Where this is the case the justification for this should be clearly set out (i.e. tested through Local Plan or five-year supply statement), otherwise without a realistic assessment of the potential for non-implementation the housing land supply could be over-estimated from several sources e.g. sites with planning permission not started.

This relates to our concerns regarding the timing of the delivery of this supply. There is no year by year housing supply trajectory provided within the Position Statement. At Appendix 6 of the Position Statement it is noted that around 31% (63,383 dwellings) of the housing supply has been completed in 2011/12-2018/19. This leaves 69% (141,999 dwellings) of the supply to be delivered in the remaining plan period up to 2031. This would suggest a significant uplift in delivery being required

from the current average of 7,923 dwellings to 11,833 dwellings per annum. There is no justification provided for this within the Position Statement.

In the Overall Approach Topic Paper (paragraph 150) the Council identifies that the updated supply includes the draft SLP contribution from SBC but does not yet include contributions from authorities that have published plans or emerging plans since the 1st April 2019, such as Lichfield District (4,500 dwellings 2018-2040) and South Staffordshire District (4,000 dwellings 2018-2038). SBC suggests that less than a third of this provision would need to be made by 2031 to address the remaining shortfall. However, it should be noted that the South Staffordshire Local Plan Preferred Options has been delayed from summer 2020 to summer 2021 with implications for the adoption timetable too. The Lichfield District Local Plan Publication Plan initially scheduled for May 2020 has also been delayed until Winter 2020/21. There are also no apparent published Statements of Common Ground confirming these contributions to date. As noted above, there is no trajectory within the Position Statements; therefore, the degree to which any additional supply could contribute is unknown. The draft SLP should not therefore be relying upon unsecured contributions from other local authorities at this stage. Nevertheless, as detailed within our Housing Technical Note, even taking into account pro-rata contributions from these local authorities up to 2031, we consider that the minimum unmet housing need against the BDP shortfall remains and is still significant **(between 11,294 and 13,101 dwellings as detailed above)**.

The Position Statement (paragraph 4.6) also notes that one of main source of increased housing supply is from Birmingham City itself which has delivered more than previously anticipated (a 27% increase in supply from 2017, or 14,300 more dwellings than the BDP identified supply of 51,100 dwellings). Whilst not expressed within the Position Statement, it is understood that much of the additional capacity from Birmingham has been due to high density developments. Therefore, whilst the level of development may have increased, this is not necessarily serving the qualitative housing market needs in terms of tenure. The Birmingham Development Plan Authority Monitoring Report (2019) identifies that since 2011/12 around 68% of housing completions have been for 1 and 2 bed properties (with a substantial jump in such completions for 2017-2019). This is against the BDP Policy TP30 requirements for around 45% of properties to be 1 and 2 bed.

The Position Statement (Table 6) also identifies some notable increases for other local authorities, including 10% for SBC and 17% for both South Staffordshire and Tamworth for example. No additional commentary is provided on what lies behind the assumed increases for each of these authorities making it difficult to judge how reasonable such increases are. This should be detailed further within the Position Statements, or subsequent Statements of Common Ground to provide a clear audit trail of the housing land supply.

Lastly, and crucially, the Position Statement only addresses the housing market area shortfall up to 2031. It does not provide an assessment up to 2036 (end of plan period for the draft SLP). Within the most recent Position Statement commentary is provided on the post-2031 picture (paragraphs 4.2-4.3) where it notes that the Black Country Authorities have evidenced a significant shortfall through the 2019 Urban Capacity Review Update of up to 29,000 dwellings between 2019-2038. Some of this shortfall (7,500 dwellings) arises up to 2031, however the majority is beyond. The GBHMA shortfall post 2031 will also be further informed by the review of the BDP when it commences. Whilst figures may not be confirmed, the Position Statement concludes that a shortfall post 2031 is emerging (paragraph 6.3) stating it is **"now apparent that there will be a HMA shortfall post 2031, with the Black Country along estimating a shortfall of 29,260 dwellings, 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."** However, following the same methodology as applied for our calculations of the actual housing shortfall up to 2031, we consider that application of the existing Standard Method for the GBHMA would create an unmet need of

between **17,000 and 18,400 dwellings** for the period 2031-2040 (as set out within the 'Unmet Need Beyond 2031' section of our supporting Housing Technical Note).

In relation to the position post-2031, the Overall Approach Topic Paper provides further commentary on SBCs current position. It states that at this early stage Birmingham City Council has not made any request to any local authority within the HMA to assist with housing needs beyond 2031, nor is the extent of any shortfall confirmed (paragraph 152). In relation to the Black Country shortfall, the Topic Paper (paragraphs 153-54) provides an update on the most recent Position Statement. It states that on the 4th August 2020 the Black Country Authorities wrote to all members of the HMA regarding the Black Country Joint Local Plan Review. This identified that the authorities are preparing a Draft Plan for consultation in Summer 2021, a Publication Plan in Summer 2022 and adoption in 2024. Following initial work for the Plan around urban capacity and potential Green Belt release within the Black Country, there remains a significant unmet need of at least 4,500-6,500 dwellings and up to 292-570 hectares of employment land up to 2039. SBC therefore considers that given the timetable for the Black Country Local Plan and the need for further work on evidence for this shortfall (which is subject to further testing) no further provision is provided at this time for post-2031, but it commits to continuing to work jointly with other members of the HMA. It states (paragraph 154) that

"given the likelihood of a Local Plan review within SMBC prior to 2031 the Council is of the view that this issue can be managed further as part of its next Local Plan review."

However, we consider that the degree to which the other GBHMA authorities are in agreement with this approach is not demonstrated. As noted above, there are no Statements of Common Ground produced to date and the other GBHMA authorities have previously expressed concerns with the level of SMBCs contribution to the GBHMA shortfall. The Overall Topic Paper (at paragraph 163) states that

"the only area of outstanding discussion relates to the delivery of homes to meet unmet housing need within the HMA beyond 2031. This need is likely to arise from Birmingham and the Black Country and will be the subject of on-going duty to cooperate discussions."

We would note that as part of the recent adoption of the Guildford Local Plan (2019) the Inspector considered that additional 'headroom' in the housing land supply was justified, partly as a result of helping to meet likely unmet housing needs from Woking which whilst not fully quantified was expected to demonstrate an ongoing shortfall in supply. The headroom between the local housing requirement for Guildford (which does not include a specific requirement for Woking's unmet needs) and the supply was around 36%, which was considered reasonable by the Inspector. This also provided flexibility for slippage in the housing trajectory and to address affordability issues.

As stated within the Overall Approach Topic Paper and the Position Statements, it is clear that the GBHMA authorities are of the view a shortfall post-2031 will exist it is just yet to be fully quantified. As a consequence, it is considered that SBC should seek to provide further flexibility within the housing requirement to help meet the likely ongoing shortfall up to 2036. At present, the difference between the local housing need for SBC itself (12,912 dwellings - minimum local housing need) and the housing land supply of 15,017 dwellings (which is then providing a contribution to the GBHMA shortfall) represents a headroom of only 16%. This is less than half of what was considered reasonable in the case of the Guildford Local Plan. The draft SLP should therefore look to increase its housing provision requirement to allow further headroom that could address the GBHMA shortfall both now and going beyond 2031. This would also serve to address the remaining minimum shortfall of 2,597 dwellings up to 2031 identified within the latest Position Statement, which as outlined above we have concerns with and consider this is in fact higher.

Affordability: Whilst we do not advocate that affordable need has to be met in full when determining the local housing requirement⁴, 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 local plan may need to be considered where it could help deliver the required number of affordable homes”** (PPG Paragraph: 024 Reference ID: 2a-024-20190220). It is noted that the Inspector for the recently adopted Guildford Local Plan also provided support for the headroom of 36% in housing land supply referenced above on the basis that it would help provide further affordable housing to address affordability issues.

At paragraph 158, the draft SLP states **“affordable housing need is exceptionally high as Solihull has one of the most severe affordability problems in the West Midlands region.”** It notes that median house prices stand at 8.42 times the median earnings of those working in the Borough and that the shortage of affordable housing is particularly severe in the Mature Suburbs and Rural areas of the Borough. ONS data shows the ratio of lower quartile house prices to lower quartile gross earnings is 9.02, compared to 7.27 for England and 6.92 for the West Midlands. The HEDNA (page 126) states that the need for affordable housing is ‘clearly acute’ and identifies a net affordable need for 578 affordable dwellings per annum. Based upon the draft SLP requirement for 40% affordable housing on major market housing sites only (Policy P4A) there will be a shortfall in meeting these needs. The proposed housing requirement of 938 dwellings per annum would deliver a likely maximum of 65% of this affordable housing need (taking account of the fact that the 40% affordable requirement is only necessary for major market housing sites). The ‘Meeting Housing Needs’ Topic Paper (paragraph 71) identifies that the 578 figure is not a ‘target’; however, it states that the evidence (HEDNA) suggests affordable housing should be maximised where opportunities arise which goes beyond the 40% market housing site requirement e.g. working with Registered Providers to deliver 100% affordable sites. However, it does not provide any commentary on how a higher housing requirement could serve to meet additional affordable housing needs, as recognised with the PPG and case law, and other Local Plan examinations to date.

As outlined in Section 4 of our Housing Technical Note at Appendix 3, affordable housing delivery is another factor to consider. The Council’s 2018/19 Authority Monitoring Report records 1,105 net affordable completions in the past five years (221 dwellings per annum). Against the need determined by the HEDNA (578 affordable dwellings per annum) this would account for only 38% of need. This delivery represents 32% of total housing completions during the period 2014-19, set in the context of the adopted Solihull Local Plan Policy P4 requirement for 40% affordable housing. To provide the HEDNA’s affordable need of 578 dwellings per annum at 32% of delivery, the housing requirement would need to exceed 1,800 dwellings per annum. Whilst we do not suggest that this should be the housing requirement, it is an important indicator of the failure to deliver affordable housing at the levels which the HEDNA considers are required. A higher housing requirement could therefore serve to deliver additional affordable dwellings and address the acute affordability issues in the Borough. We would also highlight potential issues around viability for some major allocations, such as in Balsall Common (in the absence of any evidence that significant infrastructure requirements have been tested through the Viability Study with the affordable housing policy in mind).

Capacity for further growth: As outlined in our comments on the Spatial Strategy and Site Selection above, we would question whether the true capacity for further growth has been fully realised via the draft SLP in light of the site selection process in particular. We consider that further capacity for growth could be considered via the additional release of Green Belt sites.

Summary of recommended changes to Policy P5 housing requirements

⁴ As per the judgement of Mr Justice Dove, 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

We consider that the following changes are required to the draft SLP to ensure it is positively prepared, justified, effective and consistent with national planning policy:

- The draft SLP housing requirement is not currently justified and should be increased to a minimum of **18,500 dwellings** to reflect the outcomes of additional, realistic economic uplift scenarios to meet the envisaged jobs growth at UK Central Hub, tested via our review of the evidence base (HEDNA).
- The current level of contribution to the unmet needs of the GBHMA is not considered positively prepared or justified as there is no evidence of agreement via Statements of Common Ground. Our review of the evidence identifies that the contribution is not justified as the level of unmet need against the BDP identified shortfall of 37,900 dwellings is in fact significantly higher than that suggested in the latest Position Statements for the GBHMA for both up to 2031 and beyond 2031. It is therefore considered that the draft SLP housing requirement should be increased to provide more headroom to help meet GBHMA housing shortfall needs up to 2031 beyond (up to 2036, which falls within the draft SLP plan period).
- Whilst we do not advocate meeting affordable housing need in full, we consider that more needs to be done to address the acute affordability issue and so the recommended local housing need of 816 dwellings per annum within the HEDNA should also be increased to maximise the contribution towards meeting this need.

Policy P5 Provision of Land for Housing (Housing Land Supply)

Point 1 of Policy P5 identifies the allocations for 5,270 net additional homes will be part of the overall housing land supply detailed in the accompanying table. Point 2 of Policy P5 states that the annual housing land provision target is 938 net additional homes per annum (2020-2036) and trajectory is provided to indicate how this will be delivered from all sources of housing land supply.

We consider that Policy P5 of the draft SLP is unsound in respect of the housing land supply identified. It is not justified or effective.

The supporting text to Policy P5 (draft SLP, paragraph 222 and associated Housing Land Supply table) identifies that the housing growth requirement can be delivered through sites with planning permission, deliverable sites identified within the Strategic Housing and Economic Land Availability Assessments, allocated sites and unidentified windfall sites (predominately within South Solihull). We consider that there are a several issues associated with the identified housing land supply which give rise to concerns that the draft SLP will not be effective in delivering the housing requirements. These are set out in further detail below.

Sites identified in land availability assessments and in the brownfield register: these total 397 dwellings and are not secured via any planning permissions or allocation. This also appears to be the case for Town Centre Sites (861 dwellings at Solihull and 100 at Chemsley Wood). The total of these sites is 1,358 dwellings. A 10% discount rate is applied to sites with (but not started) and without planning permission meaning the total 1,358 dwellings is reduced to 1,222 dwellings. This represents around 8% of the housing land supply that is not secured via planning permission or an allocation. Given the relatively higher degree of risk to such sites coming forward, it is considered that additional flexibility is needed within the plan to provide a contingency to these sites not progressing as currently anticipated.

Windfall allowance: there is a substantial reliance on windfall developments, which is increased to 200 dwellings per annum (from 2022) from the previously assumed levels of 150 dwellings per annum in the Solihull Local Plan (2013). At 2,800 dwellings it represents around 19% of the overall housing land supply. The Council's evidence for the windfall rate is contained within Appendix of the Draft SHELAA. However, this only looks at past trends and does not include an assessment of expected

future trends (as per NPPF paragraph 70). This could be dependent upon the sources of these windfall developments e.g. conversions or new build and greenfield or brownfield sites. In order to justify this level of anticipated windfall supply it is considered further evidence should be provided. The reliance on windfall as a proportion of the overall housing land supply should be reduced via the securing of additional allocations.

UK Central Hub Area: the area is to provide 2,740 dwellings via allocations at the NEC (2,240 dwellings) and Arden Cross (500 dwellings) up to 2036. This represents around 18% of the overall housing land supply. This is based upon the NEC masterplan (2018), the Hub Growth and Infrastructure Vision (2019-2029), the emerging Arden Cross masterplan (2020) and what is expected to come forward in the Plan period. The Arden Cross Masterplan (2020) seeks to amend current plans for surface car parking at HS2 to provide multi-storey car parking to enhance its contribution to growth including 3,000 new homes (500 within the Plan period). At paragraph 88 of the draft SLP it states that in relation to the UK Central Hub:

“it is recognised that given the time span for development to be undertaken, and the uncertainties about what may take place in the later years, there needs to be an increased emphasis on monitoring what does come forward, and what the implications are for the plan.”

At paragraphs 839-842 the broad infrastructure requirements for the area are noted, including significant transport infrastructure upgrade requirements. No site-specific trajectory is provided, although at paragraph 830 the draft SLP suggests residential development at the NEC could potentially commence from 2022 onwards and the Arden Cross site will not be fully available until after HS2 is completed. The Hub Growth and Infrastructure Vision (2019-2029) provides broad development periods for key elements of the UK Central Hub Area overall. This suggests residential development at the NEC could occur between 2024-2028 with the NEC masterplan vision in place by 2029. It recognises that development at Arden Cross will progress from 2029 onwards following completion of the HS2 interchange and significant transport infrastructure upgrades. The NEC Masterplan (2018) states that in relation to delivery certain sites within the overall masterplan are less reliant on public sector investment in on-site and off-site transport infrastructure, making them more deliverable in the early years; however, whether this applies to the residential element of the masterplan is not made clear. It states that the approach to delivery will also reflect:

“ownership, constraints and development activity across the wider area. A key element of the delivery strategy is to release surface car parking land for development, re-providing this capacity on on-site multi-storey car parks...”

Without a detailed site-specific trajectory for the proposals, which relates to delivery timings for critical infrastructure and relocation of existing land uses, such as car parks, it is difficult to determine the delivery timeframe of the 2,740 dwellings (particularly for those at the NEC which the draft SLP appears to suggest could occur from 2022, but the Hub Growth and Infrastructure Vision suggests would be 2024). Nevertheless, it is clear that the Arden Cross proposals in particular are reliant upon significant infrastructure coming forward as programmed, which is a risk that should be considered in identifying the need for further flexibility in the housing land supply. In the absence of any evidence to the contrary, we would conclude that the potential to deliver 2,740 here within the Plan period is very unlikely.

Allocated Sites: Allocated sites to 2036 are to provide 5,270 dwellings (around 35% of the overall housing land supply). The draft SLP (including the Concept Masterplans) and Draft SHELAA do not provide any detailed site-specific trajectories for these sites. At paragraph 226 the table provides indicative delivery periods for each of the allocations, based upon 5-year tranches. The assumptions underpinning these indicative delivery periods for each site are also not detailed e.g. lead in times and annual delivery rates. It is therefore difficult to critically assess the deliverability of each site,

particularly in terms of their ability to deliver in the first five years of the Plan. We do however have some concerns with the delivery trajectory of some of these sites. For instance, several of the site allocation supporting justification texts refer to multiple and complex land assembly issues which could impact upon the timing and phasing of delivery (e.g. allocations SO1, KN2). As detailed above [or move commentary on allocations here / below], some site allocations are also dependent upon infrastructure delivery issues being overcome e.g. Balsall Common (relief road); KN1 and other sites where the need for the replacement pitches are dependent on land remaining in the Green Belt; and KN2, which relies on an uncosted and untested provision of an all through school. We consider there is a need for further flexibility in the allocated sites supply to provide a 'contingency' in the event that sites which have identified delivery issues may be delayed in coming forward.

These issues will have implications for the housing trajectory and delivery going forward. The draft SLP (paragraph 224 of the draft SLP and associated table) identifies a stepped requirement for the housing requirement in recognition of the fact that larger sites will not contribute to completions until the mid-delivery phase of the Plan period. There is a jump in the stepped requirement from Delivery Phase I (2020-2026) for 851 dwellings per annum, to Delivery Phases II and III (2026-2036) which have a requirement of 991 dwellings per annum. The Phase I delivery requirement is below the annualised Plan requirement of 938 dwellings. Clearly, should there be delays to the larger site allocations going forward this will exacerbate the shortfall in meeting needs for the remainder of the Plan period. It is noted that the five-year supply requirement identified is already marginal (at 5.37 years).

Related to this, the Draft SHELAA (2020) does not provide any details on the assumptions underpinning the housing trajectory overall, including for the five year housing land supply set out e.g. lead in times and annual delivery rates for sites forming part of the overall supply (as required by the PPG Paragraph 022 ID: 3-022-20190722). Whilst the SHELAA (2016) provides some commentary on this at a broad level for all sites within the SHELAA (at paragraphs 4.17-18) it should be confirmed what assumptions have underpinned the specific site allocations, based upon feedback with the landowners/intended developers. Without this the housing trajectory and five-year housing land identified is not fully justified.

It should be recognised that the draft SLP currently does not provide any flexibility to the housing land supply requirement. The draft SLP identifies that it will contribute 2,105 dwellings towards the unmet needs of the GBHMA. This is identified as the difference between the baseline requirement of 12,912 minimum local housing needs requirement for Solihull Borough and the housing land capacity figure of 15,017 dwellings. Effectively, the draft SLP does not then provide any flexibility to ensure the Solihull Borough needs and the wider GBHMA needs are met. If the full housing land supply of 15,107 dwellings is not realised then not only will Solihull Borough's needs not be met, the HMA needs will not be met. As noted above, the Guildford Local Plan provides a 36% headroom above its own housing requirements, which helps provide for the unmet needs of Woking. In the recent case of South Oxfordshire Local Plan Review, which is currently at Examination, the Inspector (in his Preliminary Conclusions Letter, August 2020) has supported the housing land supply position, which provides the equivalent to a 27% headroom⁵. This provides contingency in the event of larger allocations being delayed in coming forward, or failing to deliver at all, which is important given that the South Oxfordshire Local Plan has a stepped trajectory that is reliant on larger scale urban extensions. This is a similar position to the draft SLP which also relies on a stepped trajectory and some larger scale site allocations such as those at UK Central Hub, Balsall Common and Blythe. In this context, the lack of any flexibility to the draft SLP housing land requirement is not justified and means the plan will not be effective. It also undermines the draft SLP's ability to be positively prepared in the context of contributing to unmet housing needs.

⁵ The South Oxfordshire housing requirement totals 23,550 dwellings (consisting of 18,600 homes for South Oxfordshire's own needs and 4,950 homes for Oxford City) and is to provide enough housing land capacity for 29,893 homes

Recommended changes to Policy P5 - Housing Land Supply

We consider that the following changes are required to Policy P5 to ensure it is positively prepared, justified, effective and consistent with national planning policy:

- Further housing land supply should be identified to provide flexibility to the draft SLP housing requirement. This would serve to provide a contingency in the event of the identified supply not coming forward as anticipated, particularly those which are reliant upon substantial and/or site-specific infrastructure being delivered at the necessary point in time (we raise significant issues above regarding the deliverability of some of these sites, which could reduce supply further). This should have regard to the levels of flexibility considered appropriate in recent Local Plan examinations, as noted in our comments.
- Further evidence is required to justify the windfall allowance within the housing land supply.
- Further detail and evidence is required to justify the housing trajectory overall and site-specific trajectories should be provided within the draft SLP.

Other Policy P5 Provision of Land for Housing Comments

Policy P5 Point 5 requires all new homes to meet nationally described space standards. **This element of Policy P5 is considered unsound as it is not justified or consistent with national planning policy.** There does not appear to be any evidence providing justification for this taking full account of need, viability and timing, as required by the NPPF, Footnote 46 and the PPG (Paragraph: 020 Reference ID: 56-020-20150327).

Recommended changes to Policy P5 – Point 5

The requirement should be removed to ensure the draft SLP is justified and consistent with national planning policy.

Policy P9 – Mitigating climate change

Points 3 (i) and (ii) of Policy P9 require all new dwellings to achieve a 30% reduction in energy demand/carbon reduction improvement over and above the requirements of Building Regulations Part L (2013) up to 2025 where all new dwellings should be net zero carbon. This goes beyond the Future Homes Standard (2019) consultation proposals for 75-80% reduction by 2025 and it goes beyond the current PPG (Paragraph: 012 Reference ID: 6-012-20190315 reflecting the Written Ministerial Statement from 2015) which states authorities should only set requirements equivalent to Code Level 4 (a 19% reduction against current Building Regulations). Under Point 3 (iv) major housing developments are also required to provide at least 15% of energy from renewable and/or low carbon sources. Under Point (viii) developments are required to provide one electric charging point per vehicle. Whilst we support the move to a zero-carbon future, the proposals must be supported by evidence to demonstrate they are deliverable. **Overall, the policy requirements are unsound as they are not justified or effective, particularly in relation to viability considerations.**

The Point 3 (i) refers to both energy and carbon reduction which are two separate measurements. The Future Homes Standard (2019) refers to carbon emission reductions; this should be clarified. The need for higher than national standards requirement is justified within the Protecting the Environment Topic Paper (October 2020) in terms of the SBC's ambition to achieve net-zero carbon within the Borough by 2041- ahead of the national target for 2050 as well as other local research. However, the Topic Paper (at paragraph 113) notes that the requirements, particularly for zero-carbon dwellings by 2025 will be challenging in respect of viability.

In accordance with the PPG (Paragraph: 009 Reference ID: 6-009-20150327) the Viability Study (October 2020, page 48) notes that it tests the requirement for the reductions in carbon reduction and states:

“The most onerous layer of policy testing is undoubtedly Round 2e, where the allowance for Code Level 5 - Zero Carbon Homes is included. On average, this results in a reduction of circa. £158,000 per net acre for each site, which would render Site 17 unviable in comparison to the marginal outcome of Round 1 of testing, as well as bringing the residual land values of other sites closer to the respective benchmark land values.”

It is however noted that the Viability Study does not test the impact of the 15% energy from renewable/low carbon sources requirement, contrary to the PPG. The requirement for 15% of energy from renewable/low carbon sources is also considered contrary to the ‘energy efficiency hierarchy’ whereby energy efficiency measures are prioritised in the first instance. It is not clear what up to date local evidence informs the requirements e.g. evidence of local renewable and low carbon opportunities (as per the NPPF paragraph 151). The Protecting the Environment Topic Paper refers to a Renewable Energy Feasibility Study being commissioned but this is not due until 2021.

The Policy does not contain sufficient clauses related to site specific viability or site-specific constraints which may impact upon the implementation of the requirements. At Point 1 of the Policy reference is made to developments providing measures **“dependent on their scale, use and location.”** This is not considered to provide sufficient flexibility in the context of the requirements. It is noted that other policy requirements within the draft SLP e.g. optional standards at Policy P4E are subject to more detailed clauses, including viability.

Recommended changes to Policy P9

We consider that the following changes are required to the draft SLP to ensure it is justified and effective. The Policy P9 Points 3 (i), (ii) and (iv) requirements should be removed, or at the very least additional clauses should be included within the policy that allow for site specific flexibility in relation to viability and site-specific constraints.

Policy P10 – Natural Environment

Points 8-13 of Policy P10 are considered to be unsound as they are not effective and are not consistent with national planning policy.

Point 8 of Policy P10 states that developments will be required to demonstrate how they will secure a ‘net gain’ in biodiversity of at least 10%. This ‘requirement’ goes beyond the guidance of the NPPF, which, at paragraphs 170 and 175(d), encourages developers to provide net gains (see also the PPG at Paragraph: 022 Reference ID: 8-022-20190721). Whilst the draft Environment Bill has proposed mandating gains for biodiversity it should be recognised that this remains subject to Parliamentary debate, processes and Royal Assent. It would be more appropriate to require a net gain and then allow any future legislation to deliver the specific figure (particularly important if the 10% is reduced).

Points 9 and 12 of Policy P10 also applies net gain to all developments on site, but net gain may not be achievable on all sites in-situ, for example due to site constraints and/or viability. This may therefore constrain delivery of development land. Moreover, the PPG (Paragraph: 021 Reference ID: 8-021-20190721) sets out that plans should consider which areas present the best opportunities to deliver gains. Whilst Point 12 allows for the provision off-set this is considered a ‘last resort’. The Natural Environment Topic Paper (paragraph 42) refers to a Local Nature Recovery Network evidence base being in production to support implementation of the policy. This should be used to support strategic, plan-level solutions on net gain rather than potentially less beneficial site by site solutions.

Recommended changes to Policy P10

We consider that the following changes are required to the draft SLP to ensure it is effective and consistent with national planning policy. The Policy should be amended to require a net gain without specifying a number; and to refer to the potential for off-site improvements to be considered not as a last resort but as part of the most sustainable solution for individual developments.

Policy P21 Developer Contributions and Infrastructure

At Point 3 of Policy P21 it refers to site specific planning obligations being sought where appropriate. Point 5 refers to Community Infrastructure Levy (CIL) developer contributions being used to fund strategic infrastructure. Point 6 notes that planning obligations from more than one development may be pooled to fund infrastructure. The Policy does not currently make reference to the Infrastructure Funding Statement to help inform these judgements regarding the use of planning obligations and pooling. **It is therefore considered unsound as it is not effective or consistent with national planning policy.**

The PPG (Paragraph: 003 Reference ID: 23b-003-20190901) states that where CIL is in place for an area, charging authorities should work proactively with developers to ensure they are clear about the authority's infrastructure needs. Authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in the infrastructure funding statements which infrastructure they expect to fund through CIL.

Recommended changes to Policy P21

To ensure it is effective and consistent with national planning policy the Policy should be amended to include a reference to the use of the Infrastructure Funding Statement to inform decision-making on the use of planning obligations, including pooling.

Conclusion

We have set out a number of recommended changes to the draft SLP related to the spatial strategy, site selection and some individual policies to ensure it complies with the NPPF and its tests of soundness. We have significant concerns that the level of housing growth will be insufficient to deliver on the Plan's own Vision, particularly in realising the opportunities around HS2 and UK Central growth. It will also fail to assist in delivering on wider unmet housing needs. In addition, the housing supply lacks any meaningful headroom or flexibility, and there are a number of sites which will deliver much less than anticipated (or in some cases, potentially at all) within the Plan period for a number of reasons, including insufficient evidence to support deliverability on sites with significant infrastructure requirements; unrealistic assumptions around build-out; and mitigation that relies on Green Belt land / very special circumstances. Finally, the site selection process lacks consistency and transparency, which leads us to conclude that it is an insufficiently justified evidence base for the draft SLP.

In combination, the issues are significant and will result in a Plan which will fail to deliver sustainable development, nor will it address the worsening affordability issue. **Without the recommended changes we must regrettably object to the draft SLP as it is not positively prepared, justified, effective or consistent with national policy.** It is clear that additional sites are required to rectify this. Our Client's site at Oak Farm, Dorridge has already been assessed as a relatively acceptable 'Amber Site' and it has been subject to consultation by the Council in March 2019 (including testing through the SA, with neutral conclusions). As set out in the appended Vision Highlights document, the site is available, suitable and deliverable and should be considered as an additional site allocation within the draft SLP.

We trust this submission is clear and helpful, but should you have any questions in relation to the above and/or attached please do not hesitate to contact me or Sarah Jones. We would be grateful for confirmation that these representations have been received and registered as duly made.

Yours sincerely,

JAMES BONNER

Associate

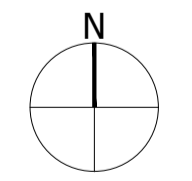
Appendix 1

LEGEND

 **Site Boundary**

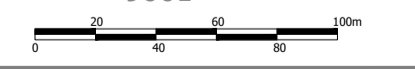


Project
Dorridge



Drawing Title
Site Boundary with Aerial

Date	Scale	Drawn by	Check by
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Project No	Drawing No	Revision	
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Appendix 2



OAK GREEN

Land at Knowle Farm, Dorridge

Vision Highlights

February 2020



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Desk Top Publishing and Graphic Design by Barton Willmore Graphic Design
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ISSUE DATE	21.02.2020
DOCUMENT STATUS	Final
REVISION	C
AUTHOR	CDB
CHECKED BY	CDB
AUTHORISED BY	JDH



OAK GREEN

Land at Knowle Farm, Dorridge

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5. Key Benefits.....	18

1. INTRODUCTION

This Vision Highlights Document has been produced on behalf of Heyford Developments Ltd to support the promotion of land at Knowle Farm, Dorridge through the Solihull Draft Local Plan.

It is prepared in response to the Solihull Metropolitan Borough Council (SMBC) January 2019 Supplementary Consultation and in particular, the Amber sites document, which identified a number of sites which were not included as draft allocations but were acknowledged as performing better than other submitted sites. The land at Knowle Farm is identified as an amber site (referenced as Land off Blue Lake Road ref A5). As this Vision Highlights Document sets out, the site should be categorised as a green site and identified as a draft allocation.

This document summarises the Vision Document produced and submitted to SMBC in December 2018, and aims to re-affirm the key benefits of the scheme and area proposed for residential development; this is a significantly decreased area from the boundary presented in the Amber Sites Consultation document, as shown on the plan overleaf.

The document has also sought to explain the rationale for establishing a resilient Green Belt boundary along Norton Green Lane, that would be required in the event of allocation of the land for housing and the removal of the site from the Green Belt.

Importantly, the proposals include an area of land that would be utilised to create a new Country Park and which would be offered alongside the proposed development and improvements to accessibility to mitigate the loss of land from the Green Belt.



Site Boundary plan

Planning Context

- » Solihull have identified a minimum housing need of 13,039 new dwellings between 2019 and 2035 based on the standard method.
- » There is an identified unmet housing need in the wider HMA which Solihull need to assist with.
- » The Council have identified exceptional circumstances to release land from the Green Belt (paragraph 137).

- » The site is in a sustainable location to meet both Solihull's and the wider unmet needs. As identified in the Council's assessment, the site performs well against suitability and availability criteria.
- » The site performs poorly against the purposes of the Green Belt and can provide a new defined Green Belt boundary using readily recognisable and defensible boundaries (paragraph 139). It also will deliver significant compensatory requirements to offset the loss of the Green Belt (paragraph 138).

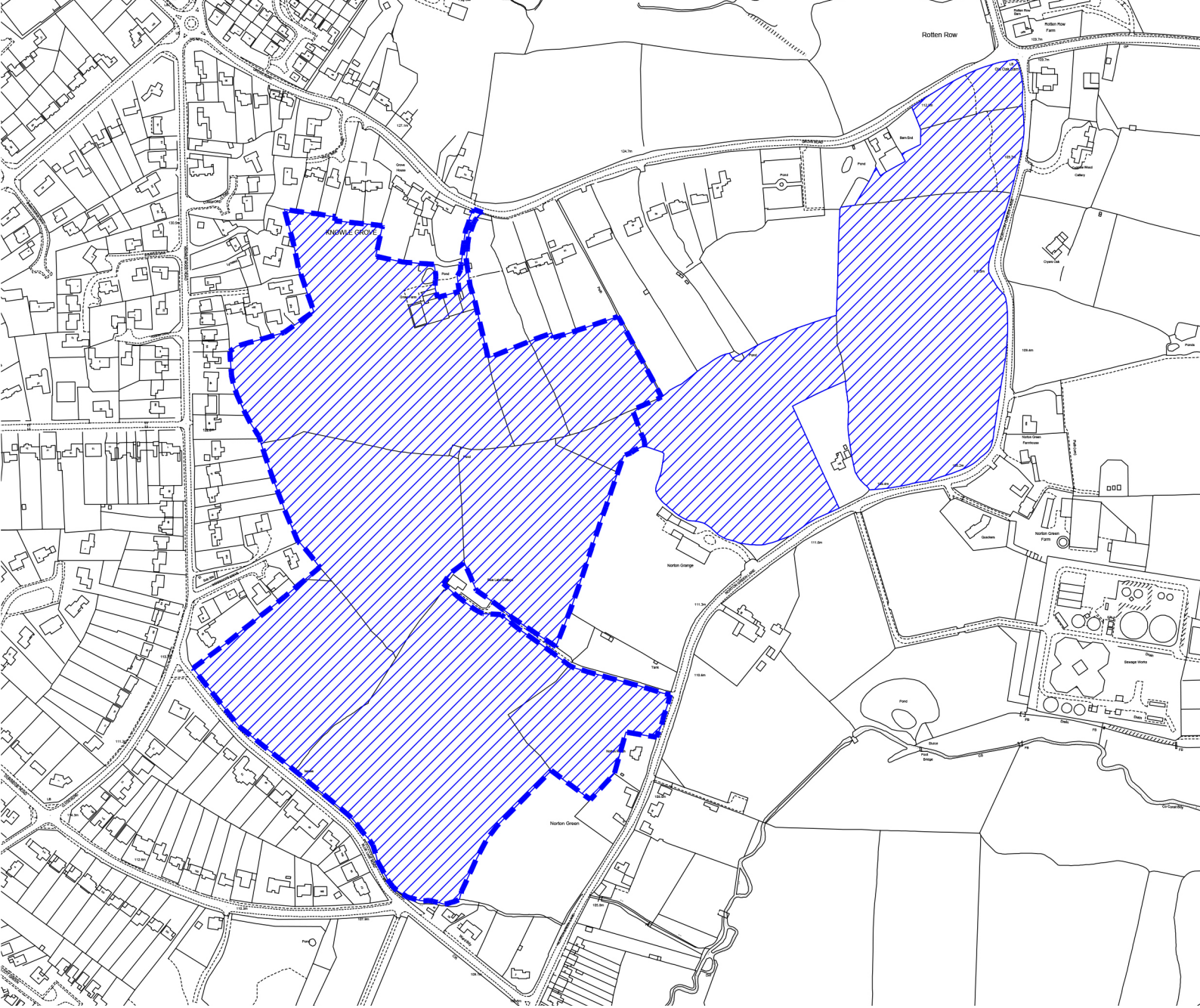
Site Assessment

A number of detailed technical assessments and surveys have been undertaken to inform the masterplan in relation to the following disciplines:



- » Access and Movement
- » Flood Risk and Drainage
- » Landscape (including visual impact, landform and landscape character)
- » Ecology
- » Arboriculture

The Vision Document (December 2018) presents a summary of these technical assessments and explains how their outcomes have shaped the concept masterplan.

Importantly, the Vision Document and supporting technical assessments have demonstrated that there are no "showstoppers" that would prevent the land at Knowle Farm being brought forward for development subject to strategic allocation through the Local Plan.



Site Boundary Plan - with SMBC Amber Sites Call for Sites Ref. 413 boundary overlaid

-  Area shown on SMBC plan
Call for sites ref 413
-  Area in which residential
development is proposed

2. GREEN BELT PROPOSALS

The fundamental aim of Green Belt policy stated in NPPF 2019 at paragraph 133 is to prevent urban sprawl by keeping land permanently open.

The Solihull Strategic Green Belt Assessment Report (Atkins, July 2016) considered the whole of the Borough. The study was undertaken with a ‘policy-off’ basis. The core purpose of the Green Belt Assessment with regards to the Green Belt in Dorridge is:

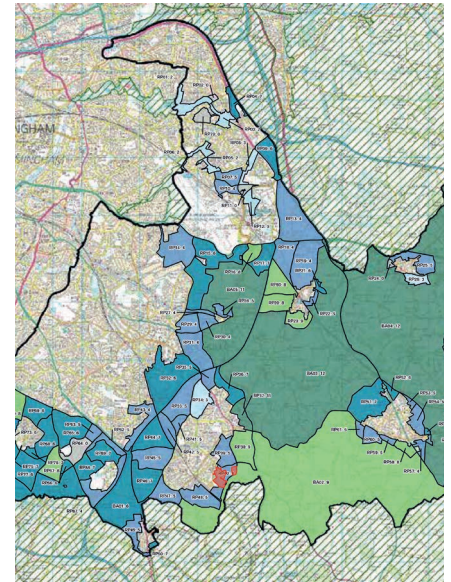
*“To assess the extent to which the land currently designated as Green Belt within SMBC fulfils the essential characteristics and purposes of Green Belt land as set out in Paragraphs 79 and 80 of the National Planning Policy Framework (NPPF).” *1*

Approximately 12,000 hectares of SMBC is designated as Green Belt land, which accounts for nearly two thirds of its area. The Green Belt within SMBC contributes to the West Midlands Green Belt that surrounds the Birmingham conurbation.

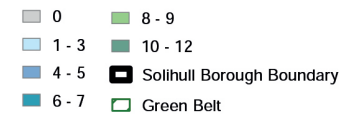
The Solihull Strategic Green Belt Assessment Report has identified Refined Parcels as areas of land that adjoin or sit adjacent to built-up areas, including inset villages, such as Dorridge. The site is within Refined Parcel RP. 40 which has a low total score of 4 out of a possible total of 12.

The 2016 Assessment states that Refined Parcels which perform highly against purpose 1: to ‘Check unrestricted sprawl of large built-up areas’ are those parcels which adjoin strong defensible permanent boundaries. The site in RP.40 scores just 1 point indicating a lower performing parcel and clearly does not make a major contribution to this Green Belt Purpose. It states that Refined Parcels which are lower performing against purpose 1 include parcels which are to the east of and immediately adjacent to the built up areas of Solihull.

Refined Parcels which perform Moderately against purpose 3 to ‘Assist in safeguarding the countryside from encroachment’ are generally those Parcels which immediately adjoin the built up areas of Solihull, Dorridge, Knowle and Coventry. Although adjacent to urban areas, these parcels are mainly characterised by countryside and do not contain development. The site in RP.40 is given its highest score of 2, more moderately performing parcel due to the absence of development, but development surrounds the site and the parcel and this exerts a strong influence.



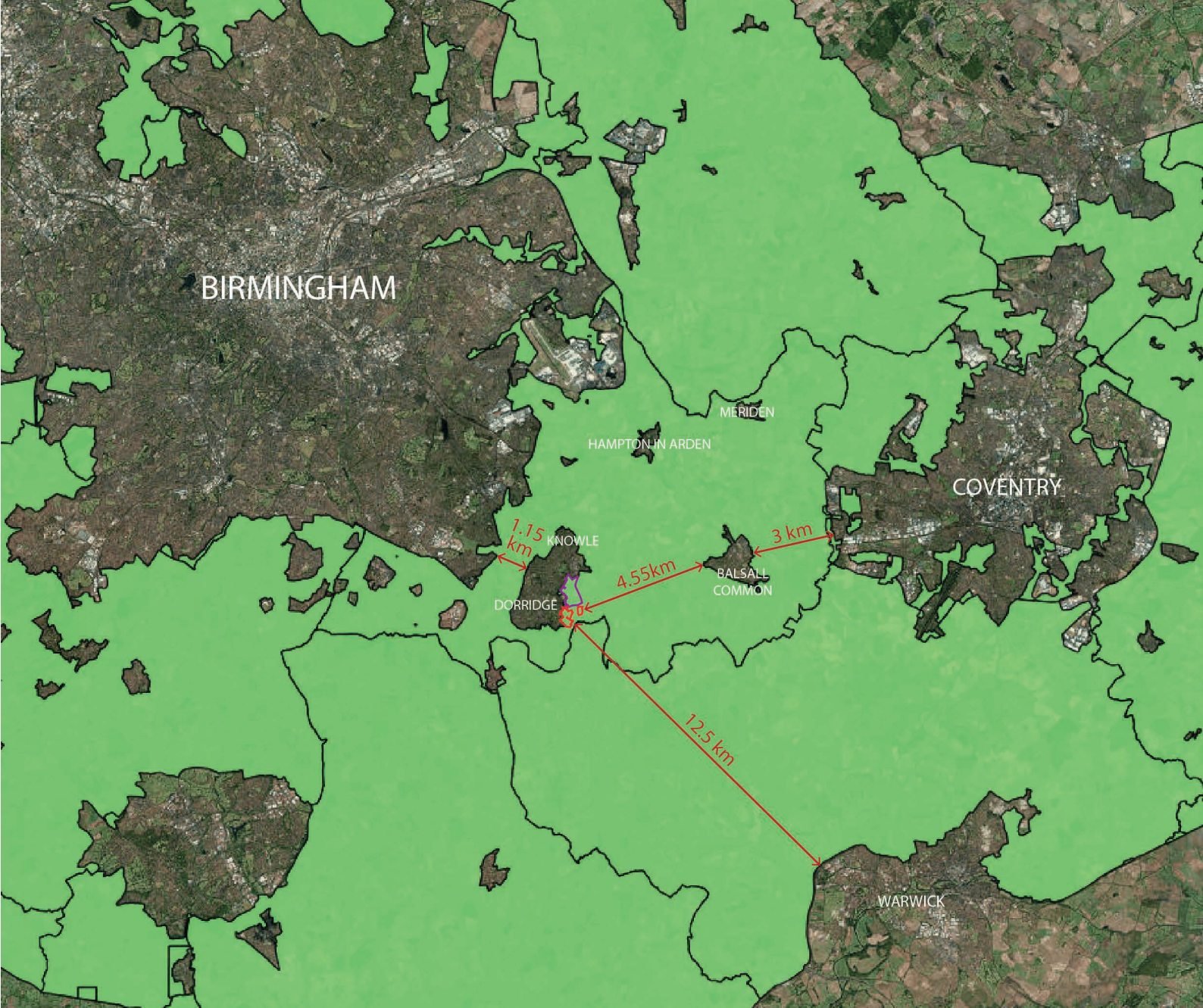
Solihull Green Belt Plan (extract from Solihull Strategic Green Belt Assessment, July 2016)







Purpose of Green Belt	RP40
To prevent Urban Sprawl	1
To prevent neighbouring towns merging	1
Safeguarding the countryside	2
Preserve the setting of historic towns	0
Total	4

Solihull Green Belt Parcel RP40 scores

*1 The National Planning Policy Framework was first published on 27 March 2012 and updated on 24 July 2018 and subsequently again on 19 February 2019.



Green Belt Plan












-  Site Boundary
-  Site 9 Arden Triangle
(Solihull Local Plan Review)
-  Green Belt
-  Distances between settlements

Purpose 1 NPPF: (a) to check the unrestricted sprawl of large built-up areas

The opportunity exists to release land at Knowle Farm to deliver additional housing. As acknowledged in the Council's Green Belt Assessment, the land within Parcel RP40 is lower performing and release of the site would enable:

- » Creation of a new and resilient Green Belt boundary along Norton Green Lane
- » Alignment of a new boundary with the Arden Triangle site and rounding off of the settlement edge on east side of Dorridge
- » Not all the land within the new Green Belt is proposed for development.

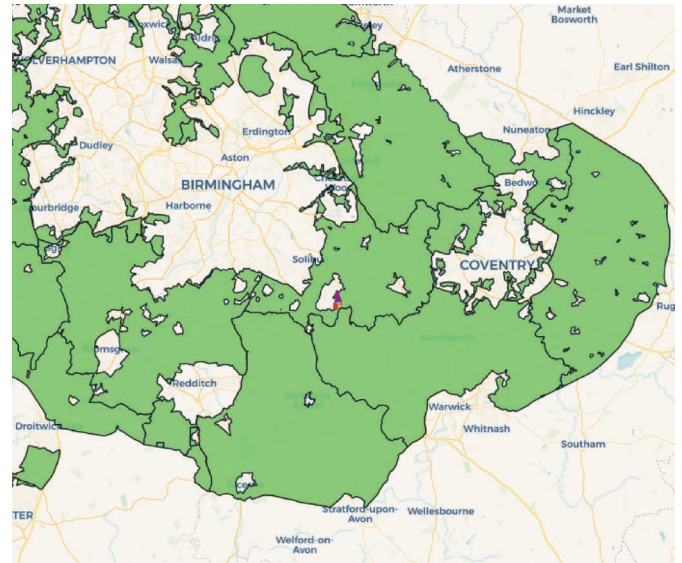


	Site Boundary		Hedgerows - Physical Feature
	Site 9 Arden Triangle (Solihull Local Plan Review)		Hedgerows Trees - Physical Feature
	Existing Green Belt Boundary		Scattered Rural Properties/Buildings
	Proposed Country Park		Settlement Limit
	Barriers to Unrestricted Sprawl		Proposed Green Belt
	Norton Green Lane - Clear Boundary		

Purpose 2 NPPF: (b) to prevent neighbouring towns merging into one another

Creation of a new Green Belt boundary along Norton Green Lane and release of land for housing in this location would:

- » Prevent further encroachment and subsequent merging of settlements
- » Maintain clear separation from Balsall Common as the nearest settlement in this non-strategic gap
- » The Green Belt is approximately 4.55km deep between Dorridge and Balsall Common



	Site Boundary
	Site 9 Arden Triangle (Solihull Local Plan Review)
	Green Belt



Purpose 3 NPPF (c) to assist in safeguarding the countryside from encroachment

Release of land at Knowle Farm and creation of a new Green Belt boundary would ensure:











- » The new Green Belt would be better related to landform
- » The site sits at the settlement edge and relates clearly and closely to the settlement
- » Not all the land within the new Green Belt is proposed for development

Proposed Green Belt Change

The new and proposed Green Belt boundary would follow existing features and have the following advantages:

- » Clear and well defined existing components in the landscape
- » Green Belt boundary would follow existing physical features including: existing highway - Norton Green Lane; existing hedgerows along Norton Green Lane; existing low lying landform; existing scattered ribbon development along Norton Green Lane; and the proposed draft allocation at Arden Triangle along Grove Road
- » Readily recognisable features
- » Existing boundary components in the landscape that are durable and are likely to be permanent



 Site Boundary	 Encroachment Limits
 Site 9 Arden Triangle (Solihull Local Plan Review)	 Norton Green Lane - Clear Boundary
 Existing Green Belt Boundary	 Hedgerows - Physical Feature
 Current and Proposed Settlement	 Hedgerows Trees - Physical Feature
 Proposed Country Park	 Proposed Green Belt

 Site Boundary
 Site 9 Arden Triangle (Solihull Local Plan Review)
 Existing Green Belt Boundary
 Proposed Green Belt

Landscape Character

National Character Area (NCA) 91: Arden

At a National level the Site is located within National Character Area (NCA) 91: Arden. Key Characteristics of the NCA which are found within the Site include the many mature Oaks that are present and well established within many hedgerows. Large and prominent Oak trees are also present as free standing trees within the Site. These individual specimens are mature and have a good shape and are a character influencing element in the local landscape.

Landscape Character Assessment (Solihull Metropolitan Borough Council)

The Landscape Character Assessment for Solihull Metropolitan Borough Council places the Site into Landscape Character Area (LCA) 3, Knowle and Dorridge Fringe.

Key characteristics of the LCA relevant to the Site and its setting include:

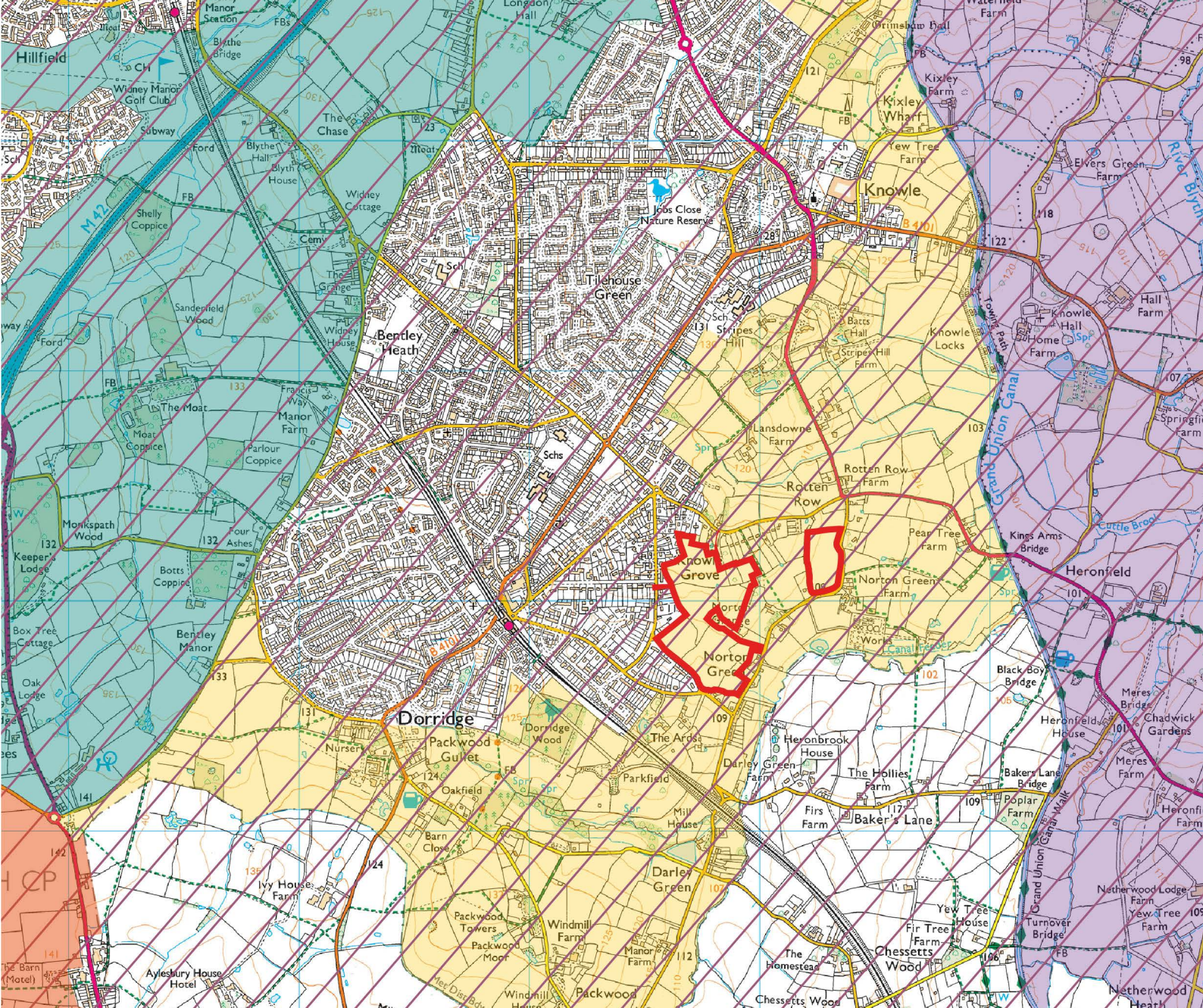
- » Land use is varied with some residential development, individual farmsteads, horsiculture, parkland and agricultural land...

- » Urban influences are evident with managed green spaces, telegraph poles and manicured hedgerows...
- » Pockets of woodland are scattered across the area.
- » Mature hedgerow trees are a key feature within the area, although some have become tall and leggy through lack of management... ash and oak are the dominant species.
- » ... Cuttle Brook, Canal Feeder and their associated springs form the main drainage pattern within the LCA, and
- » Large individual residential properties with associated gardens/ garden style ornamental planting are also present.

To a degree, the Site is representative of some of the attributes of the local landscape character insofar that it is located on gently undulating land, and that like many areas, contains a large number of mature hedgerow tree (predominately Oaks). The quantity, size, prominence, contribute to the wooded appearance of the immediate setting, and the tree cover, in unison with the rolling landform, contain the influences of settlement. .


The Council set out Guidelines for the LCA and they have some relevance to the development proposal and include:

- » Encourage appropriate management to retain strong hedgerow structure and the planting of individual trees along field boundaries, tree planting in the vicinity of Dorridge is important to its setting and approaches.
- » Resist loss of field boundaries to retain irregular field pattern to south of the LCA...
- » Promote proactive management of existing woodland and the planting of new woodland to fit with landscape pattern in particular trees and woodland at the urban edge.
- » Identify appropriate access points to the countryside and ensure that new facilities, signs and paths are low-key and respect landscape character, and
- » Encourage use of fencing with less intrusive materials in combination with hedges and follow traditional post and rail or post and wire design. Promote positive management of roadside hedgerows.







Landscape Character Areas Plan

 Site Boundary

National Landscape Character
 NCA 91: Arden

Solihull Borough Landscape Character

-  LCA 1 - Solihull Fringe
-  LCA 2 - Southern Countryside
-  LCA 3 - Knowle & Dorridge Fringe
-  LCA 4 - Rural Centre

3. SUMMARY OF ECOLOGICAL ASSESSMENT

Designated sites

There are no designated sites of nature conservation importance within the proposed development site boundary or the area identified for the Country Park. The closest site to the proposed development site is 'Blythe Source Dorridge' Local Wildlife Site (LWS), which lies approximately 200m north of the site and is designated for spring and ditch habitat. The closest site to the proposed Country Park is 'Rotten Row Field' LWS, which lies immediately adjacent to the northern boundary and is designated for unimproved grassland.

The nearest Site of Special Scientific Interest (SSSI) to the proposed site and Country Park is 'Brook Meadow, Darley Green' SSSI which lies approximately 250m to the southeast and is designated for herb-rich flood meadow grassland. No internationally-designated sites of nature conservation importance occur within 10km of the site boundary.

Habitats

The proposed development site comprises predominantly poor semi-improved grassland fields, bounded by species-rich hedgerows, several containing semi-mature and mature trees. The remnant of an old orchard is present in the northeast of the site. Residential and agricultural buildings were present whilst other habitats included introduced shrub, species-poor hedgerows, native scrub, ditches, tall ruderal and scattered trees. The proposed Country Park comprises a large field of improved grassland bounded by species-rich hedgerows and mature trees.

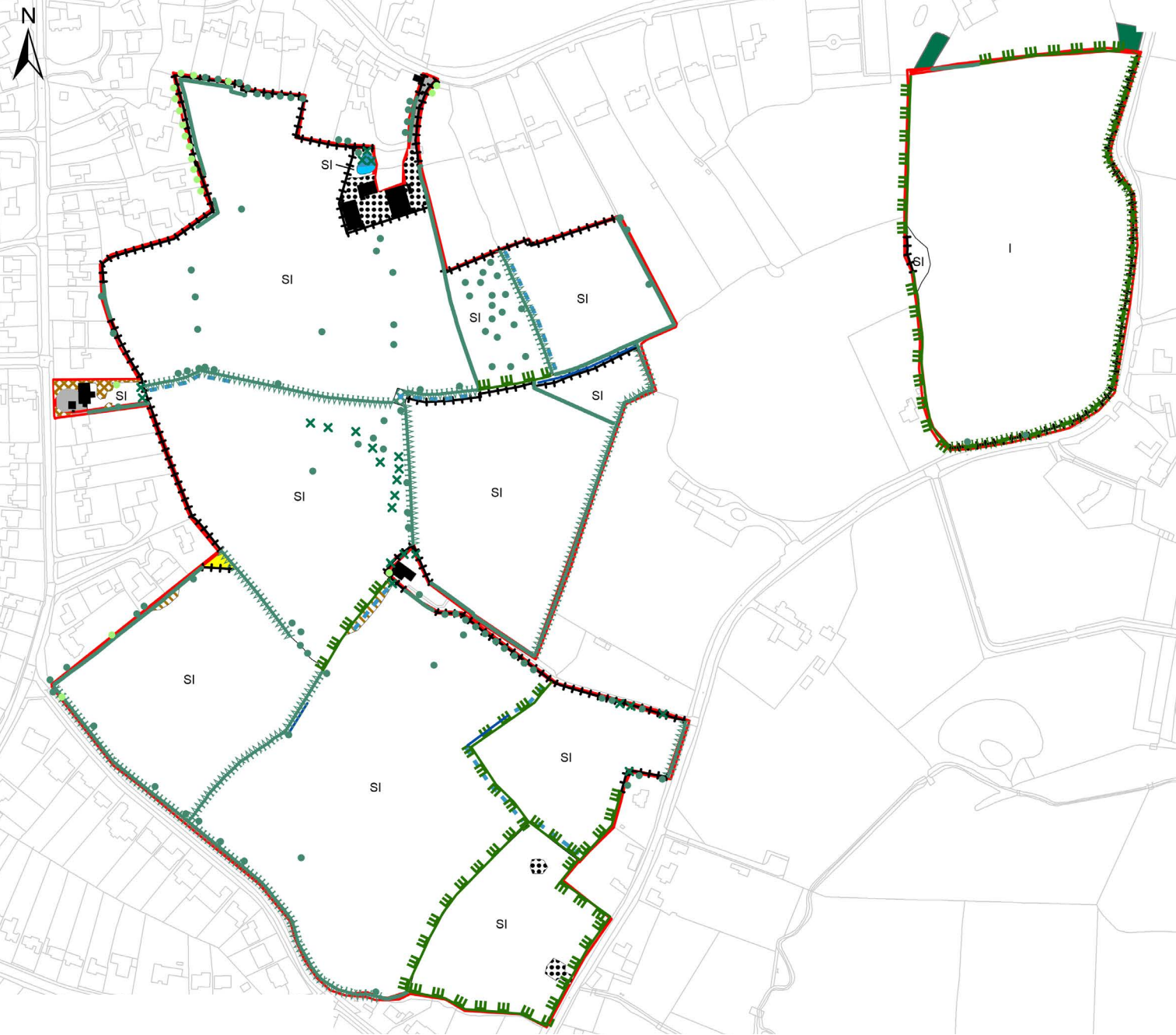
Habitats of moderate to high importance are hedgerows, ponds, mature broadleaved trees and orchard, all Priority Habitats and Warwickshire, Coventry and Solihull BAP Habitats. Poor semi-improved grassland, improved grassland, amenity grassland, bare ground, hardstanding, introduced shrub, ditches, scrub and tall ruderal habitats are of lower ecological importance.

Protected and notable species

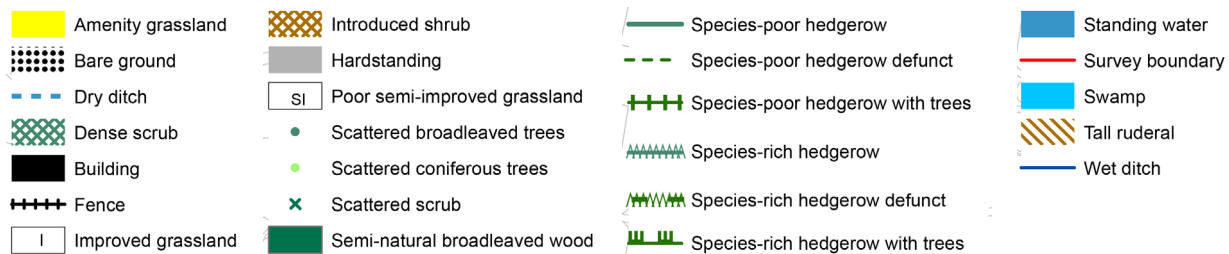
Habitats within the site could potentially support protected/notable species, including amphibians (such as great crested newt), reptiles, breeding birds, bats (including potential roosts within buildings and mature trees) and hazel dormouse. Several badger setts were recorded within the proposed development site. Several invasive plant species were also recorded, including New Zealand pygmyweed and Himalayan cotoneaster.

Conclusions

There are no overriding ecological constraints to the development of the proposed development site or Country Park. Whilst potential constraints for designated sites, habitats and protected/notable species occur, it is considered that avoidance, mitigation, compensation and enhancement measures could be provided for adverse effects. Compliance with legislation relating to statutory designated sites and protected species can be achieved and 'biodiversity net gain' can be delivered.



Phase 1 Habitat Plan

























4. CONCEPT PLAN

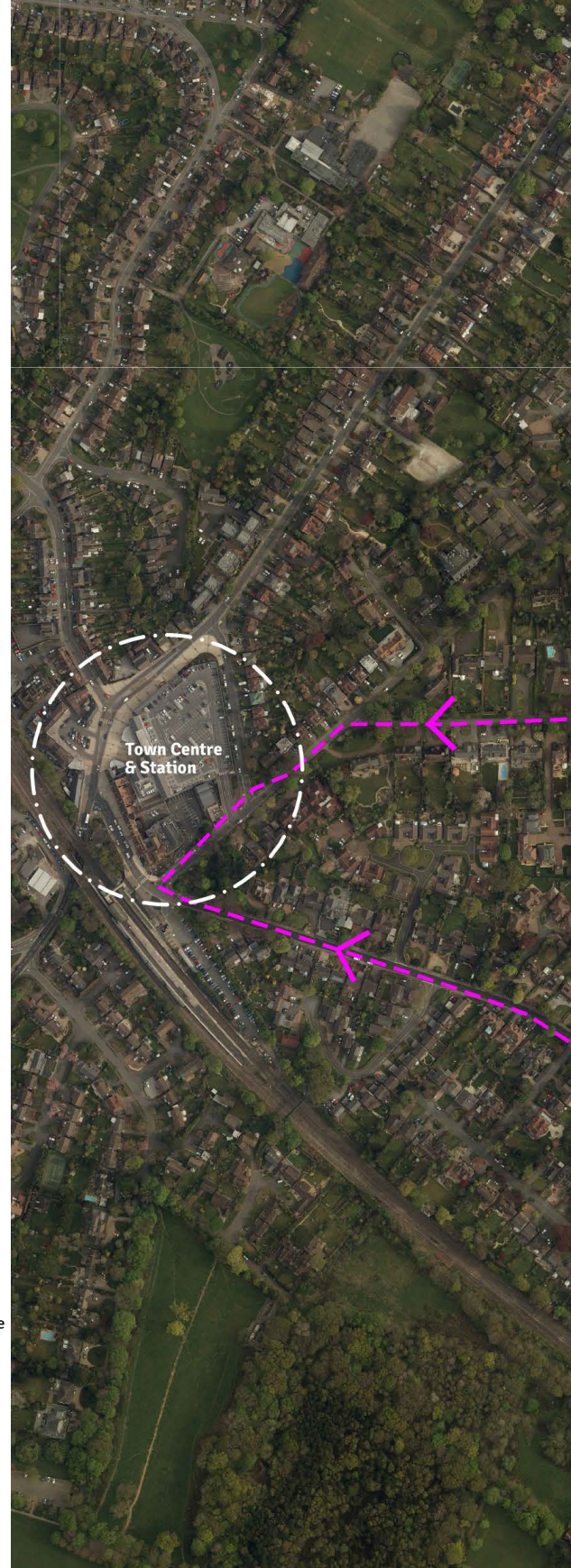
The Concept Plan presented opposite has been informed by the following design principles;

Development Form

- » Provision of approximately 9.7Ha residential development, achieving 340 using an average of 35 dwellings per hectare (35dph).
- » Delivery of a new Country Park aimed at providing landscape, biodiversity and recreational enhancements to offset the loss of the Green Belt in line with paragraph 138 of the NPPF.
- » Development will be structured to ensure the creation of a permeable, legible and safe places, with streets and spaces overlooked wherever possible.
- » The size and design of plots and dwellings will be carefully considered where development adjoins existing dwellings.
- » The proposals will be designed to ensure climate change resilience and adaptability for the future.

	Site Boundary
	Potential Primary Vehicular Access
	Potential Pedestrian Access
	Existing Pedestrian Access
	Potential Emergency Vehicular / Pedestrian / Cycle Access
	New Informal Footpath
	Primary Route
	Secondary Route
	Private Drive
	Central Park Area
	Residential Development
	Green Corridor
	Public Open Space
	Country Park Area (including car park and new recreational routes)
	Existing Trees
	Existing Hedgerow
	Area for Formal Play
	Indicative Attenuation Area
	Arden Triangle
	Existing PRoW to be Retained
	Improved pedestrian access along lane
	Link to Town Centre and Train Station

Concept Plan





Arden Triangle

Grove Road

Knowle Wood Road

New Country Park and Green Belt Mitigation

Pedestrian Link

New Open Space

Woodcote Drive

Blue Lake Road

Norton Green Lane

Pedestrian Link

Dorrige Road

Access and Movement

- » The scheme has been designed to maximise connectivity for sustainable modes of transport, recognising that it benefits from an exceptional location, in particular its proximity to central Dorridge and Dorridge Rail Station.
- » Provision of a connected and accessible primary movement route, with vehicular access taken from Blue Lake Road and Knowle Wood Road. An emergency access point will be taken from Grove Road.
- » A separate access will be provided on Norton Green Lane to access the new Country Park.
- » A new network of informal footpath routes will be provided within the site and Country Park area. Their route will reflect key desire lines across the site, and ensure easy and direct access to the Country Park, existing Public Right of Way (PRoW) and Dorridge town centre and Rail Station. These routes will also function as attractive and safe pedestrian walks that encourage physical exercise and enjoyment of the outdoors.

Landscape and Ecology

- » A new Country Park is proposed for the eastern part of the site. This will be approximately 4 Ha in size and provide for a range of recreational uses. The Country Park will provide enhanced access to the retained countryside in this location and will help to mitigate the removal of land from the Green Belt as required under paragraph 138 of the NPPF.
- » Response to Phase 1 Habitat Plan and retention of moderate to high importance habitats where possible to deliver a biodiversity net gain and important green infrastructure, including habitat corridors.
- » Potential links across the central Public Open Space will be carefully considered to ensure their design and character are appropriate to the setting of the site.
- » The proposals promote a generosity of space through the provision of significant areas of open space, and the use of appropriate densities that respond to the existing built form of Dorridge.

- » The central green space will comprise a multi-functional parkland, providing areas for formal play provision, orchard planting, attenuation and informal public open space. This green character will be promoted through the creation of highly accessible green routes, enhancing landscape amenity and ecological habitat creation.
- » Existing landscape assets such as topography, tree planting and views have helped shape the structure of development, open space and green corridors within the site.
- » Existing trees on site will be retained wherever possible and provide key focal elements within an attractive green infrastructure.





Response to Design Policy and Guidance

Although at a conceptual stage; the development will be informed by policy and design principles contained in the following guidance:

The National Design Guide (MHCLG, 2019).

Ensuring the creation of a distinctive development that responds positively to the surrounding built form and thus, re-enforces a strong sense of local distinctiveness. A thorough and robust site and context analysis that informs the masterplan, including landscape and ecology led approach to shaping the structure of development will further help to aid this.

West Midlands Design Charter (WMCA, 2020)

The proposals will embody the twelve principles contained in this document wherever possible, particularly promoting health and wellbeing principles to ensure the creation of a happy and healthy development that benefits from easy access to key facilities and open space.

Building Better, Building Beautiful: Living with Beauty (MHCLG, 2020)





















The proposals will aspire to create an attractive aesthetic that re-enforces a strong sense of place, also encouraging community pride and social cohesion.

Illustrative Images

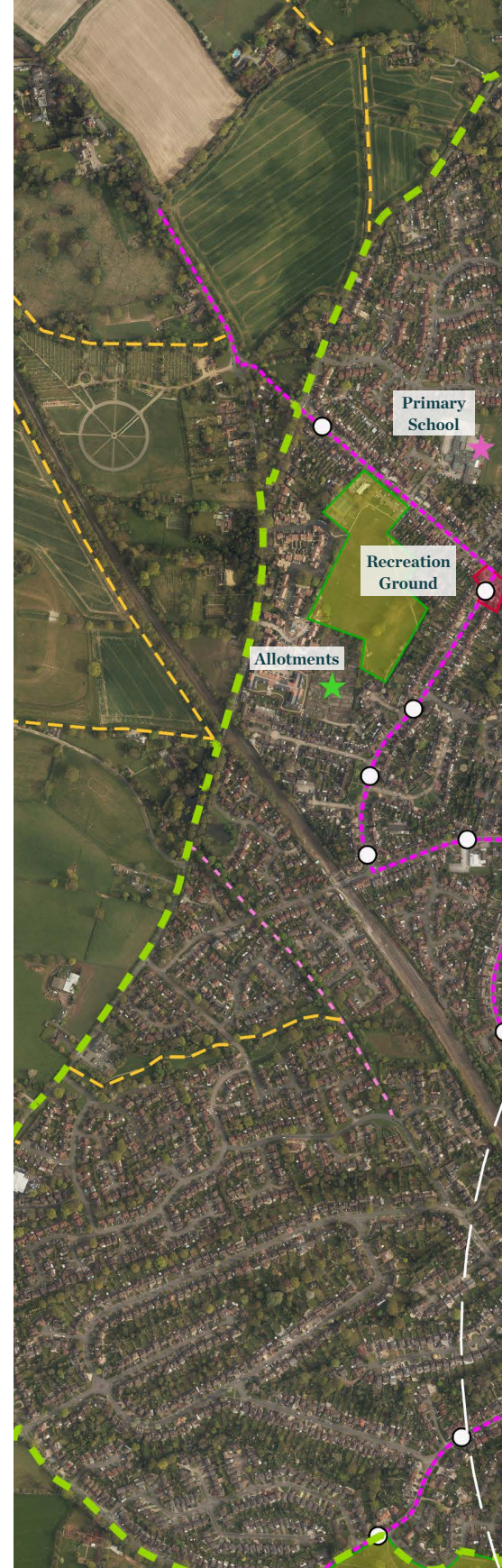


5. KEY BENEFITS

- » A high quality and distinctive scheme that can deliver up to 340 new dwellings in a highly sustainable location, with key facilities and Dorridge train station within 1km (a 12 minute walk).
- » Easy access to both primary and secondary education facilities.
- » Provision of a new country park that will become a recreation asset for Dorridge, which alongside the improved public rights of way, will offset the loss of the Green Belt.
- » A clear focus on green infrastructure, ecological enhancement (with the proposals aiming to ensure significant biodiversity net gain) and the promotion of healthy, active lifestyles through the provision of attractive open spaces that are shaped by retained landscape features.
- » A new cohesive and vibrant community formed by the creation of a safe and active development based on best practice urban design principles.
- » A freehold site in single ownership that can deliver housing within the first five years of the Plan.

	Site Boundary
	Arden Triangle
	Existing PROW- Footpath
	Existing PROW- Bridleway
	Existing PROW - Grand Union Canal (Long distance route)
	Existing Local Cycle Route
	Existing Bus Stops
	Existing Bus Route
	Residential Development (currently under construction)
	Village Centre
	Green Space
	Potential New Arden Academy
	Potential New 2FE Catholic Primary School
	Proposed Green Belt Boundary
	Train Station
	Primary School
	Secondary School
	Doctors
	Petrol Station
	Allotments

Development Context Plan





Knowle

Park

Allotments

Arden Academy

Arden Academy

Doctors

Arden Triangle

Primary School

Recreation Ground

Dorridge

Dorridge Rail Station

Local Wildlife Site & Park

Grand Union Canal

1200M

800M

Appendix 3

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

Project Ref:	29413/29068/28908
Status:	Draft
Issue/Rev:	05
Date:	December 2020
Prepared by:	DU
Checked by:	JD/KV
Authorised by:	KV

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Ref: 29413/29068/28908/A5/DU
Date: 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.¹

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;**

¹ 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.²

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."³

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"*⁴ 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."*⁵

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

³ Paragraph , page 20, Solihull Local Plan – Shaping a Sustainable Future, December 2013

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

⁵ 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.”⁶

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.⁷**

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

⁶ Paragraph 9, page 5, Solihull Local Plan – Draft Submission Plan, October 2020

⁷ 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.”⁸

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.⁹**
(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)**.¹⁰

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.¹¹

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

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

¹⁰ Page 67, Solihull Local Plan – Draft Submission Plan, October 2020

¹¹ 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.¹²

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."¹³ (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.

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

¹³ 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).¹⁴
- 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.

¹⁴ 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."*¹⁵ 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.

¹⁵ 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 factor¹⁶, 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)."*¹⁷ 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."*¹⁸ 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
Average	100,040	107,480	0.93

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

¹⁶ Paragraph 6.16, page 84, Solihull Metropolitan Borough Council HEDNA, October 2020

¹⁷ Paragraph 6.17, page 84, Solihull Metropolitan Borough Council HEDNA, October 2020

¹⁸ 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"*¹⁹ 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."*²⁰
- **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."*²¹
- **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."*²²

¹⁹ Paragraph 12.18, page 198, Solihull Metropolitan Borough Council HEDNA, October 2020

²⁰ Paragraph 22, page 6, Solihull Metropolitan Borough Council HEDNA, October 2020

²¹ Paragraph 6.31, page 87, Solihull Metropolitan Borough Council HEDNA, October 2020

²² 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)²³. 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.."*²⁴ (our emphasis)

²³ 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

²⁴ PPG, ID2a-024, 20 February 2019

4.24 The 2020 HEDNA states that the shortage of affordable housing is “clearly acute”²⁵ 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.”²⁶ (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.”²⁷ (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

²⁵ Paragraph 7.69, page 114, Solihull Metropolitan Borough Council HEDNA, October 2020

²⁶ Page 126, Solihull Metropolitan Borough Council HEDNA, October 2020

²⁷ 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 projections²⁸, 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%).

²⁸ 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 ¹	108,361	120,709	12,349 (772)
Jobs Supported ²	114,213	127,228	13,015 (813)

Source: Barton Willmore modelling

¹2011 Census commuting ratio (0.98) continuing from 2020-2036;

²Change 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 ¹	111,243	127,307	16,064 (1,004)
Jobs Supported ¹	108,721	124,941	16,220 (1,014)
Jobs Supported ²	114,592	131,688	17,096 (1,068)

Source: Barton Willmore modelling

¹2011 Census commuting ratio (0.98) continuing from 2020-2036;

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

Source: Barton Willmore modelling

¹2011 Census commuting ratio (0.98) continuing from 2020-2036;

²Change 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 ¹	217,311	257,588	40,247 (2,515)
Population ²	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 ¹	92,117	109,480	17,363 (1,085)
Dwellings ²	92,117	108,687	16,570 (1,036)

Source: Barton Willmore modelling

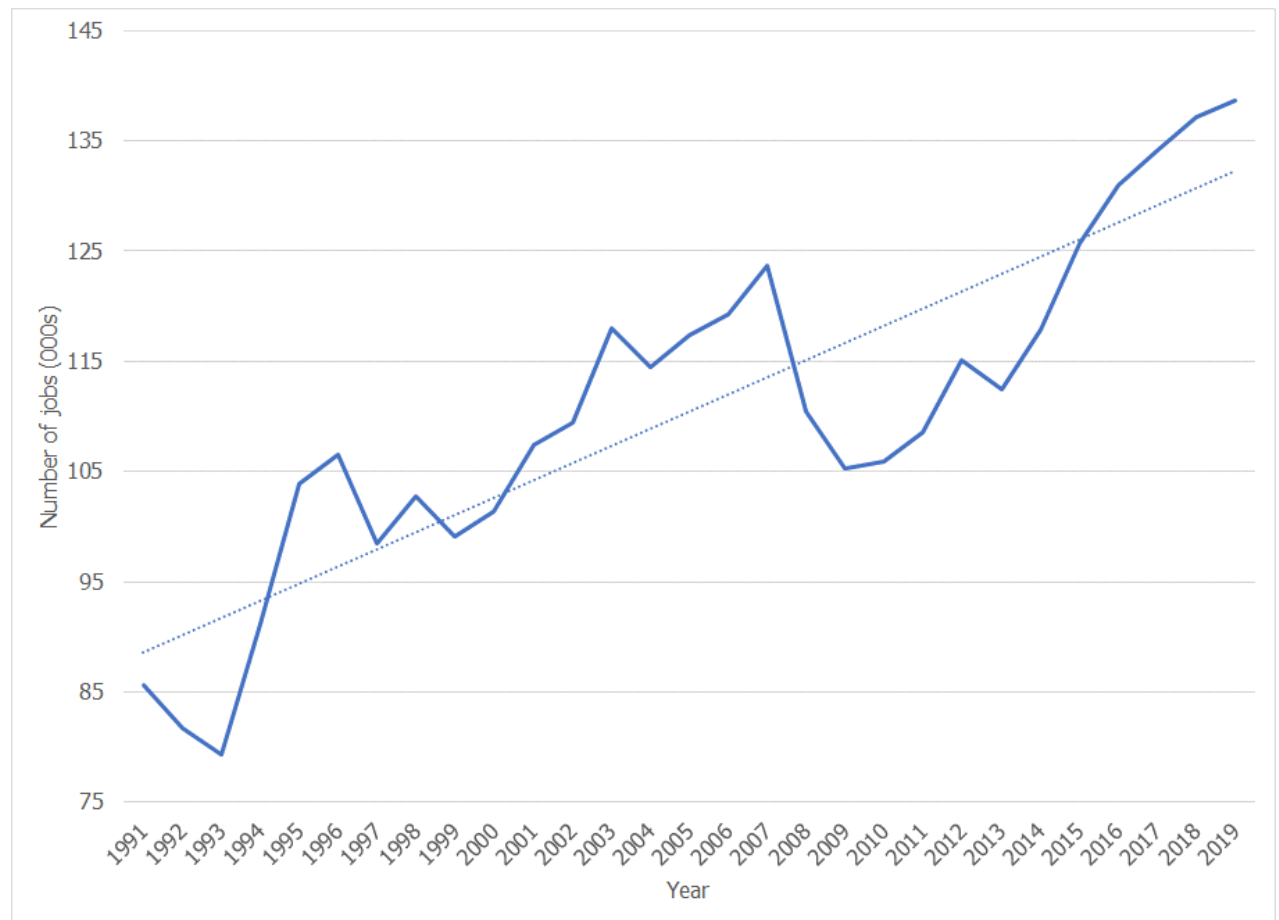
¹2011 Census commuting ratio (0.98) continuing from 2020-2036;

²Change 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 dwellings²⁹ 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.³⁰
- 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.³¹ 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).

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

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

³¹ 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	
Birmingham City	2011-31	n/a	n/a	n/a	23,600 ¹	Birmingham City Deficit to 2031
Bromsgrove	2023-40	0	0	0	n/a	
Cannock Chase	2018-36	0 – 2,500	0 – 139	0 – 1,807	n/a	
Lichfield	2018-40	4,500	205	2,659	n/a	
Redditch	2011-30	0	0	0	n/a	
Solihull	2020-36	2,105	132	1,447	n/a	
Tamworth	2006-31	0	0	0	n/a	
North Warwickshire	2014-33	3,790	199	3,391	n/a	
Stratford-on-Avon	2011-31	265	13	265	n/a	
Black Country²	2019-38	3,000*	158*	1,895*	n/a	
South Staffordshire	2018-37	4,000	200	2,737	n/a	
Total		14,660 – 17,160	n/a	10,499 – 12,306	23,600	11,294 – 13,101

¹ 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);

² 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).³²
- 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).

³² 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	
Birmingham City	2011-31	3,577 (5,069)	2,555	20,440 (50,280)	n/a	
Bromsgrove	2023-40	379	379	0	0	
Cannock Chase	2018-36	276	284/312/ 367/423	0	0/360/1,083/ 1,806	
Lichfield	2018-40	321	536	0	2,659	
Redditch	2011-30	174	337	0	0	
Solihull	2020-36	807	938	0	1,447	
Tamworth	2006-31	149	177	0	0	
North Warwickshire	2014-33	171	436	0	3,391	
Stratford-on-Avon	2011-31	603	730	0	265	
Black Country	2019-38	3,756	2,220	18,432	1,895*	
South Staffordshire	2018-37	254	466	0	2,737	
HMA Deficit 2011-2031						
Telford & Wrekin	2011-31	n/a	0	2011-31	0	
Shropshire	2016-38			2016-38	1,023	
Total		10,467	9,058 – 9,197	38,872	11,522 – 13,329	25,543 – 27,350

*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." ³³

- 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**.

³³ 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 ¹ – 813 ²	807
	2018 ONS rates	1,014 ¹ – 1,068 ²	
Employment-constrained: UK Central Hub	2016 ONS rates	1,437	1,199 ¹ – 1,248 ²
	2018 ONS rates		1,036 ¹ – 1,085 ²

Source: Barton Willmore Development Economics

¹ Commuting Ratio 0.98

² Commuting Ratio 0.93

- Growth of **between 1,036 and 1,248 dpa** would be required to support the UK Central Hub scenario (between 16,576 and 19,968 dwellings in total);
- This represents an increase of between 220 dpa and 432 dpa on the housing need calculated by the HEDNA (816 dpa), or **an additional 3,520 to 6,912 dwellings** over the Plan period;
- Our analysis of historic levels of job growth in Solihull 1991-2019 shows a range of 1,225 and 1,650 jobs per annum (jpa). This highlights that the UK Central Hub scenario (1,437 jpa) is a realistic assumption;
- The HEDNA identifies an 'acute' situation in respect of affordable housing need. Our analysis suggests that the HEDNA's conclusion on overall need (816 dpa) should be increased to meet as much affordable need as possible.
- Furthermore, our analysis of unmet need in the wider GBBCHMA suggests that the 2020 Position Statement's conclusions under-estimate the remaining unmet housing need from Birmingham up to 2031, and for Birmingham alone the deficit in unmet need is **between 11,294 and 13,101 dwellings up to 2031**;

- In addition, there is significant unmet need up to 2031 based on the existing Standard Method coming from Birmingham City and the Black Country. This amounts to unmet need of between **25,543 and 27,350 dwellings up to 2031**. If we were to assume the increased capacity for Birmingham City (65,400 dwellings 2011-2031) set out in the 2020 Position Statement the unmet need would still be **between 11,243 and 13,050 dwellings up to 2031**. This increases significantly based on the uncapped Standard Method figure for Birmingham City which would come into effect once Birmingham's Local Plan becomes older than 5 years in 14 months time;
- Adoption of the proposed changes to Standard Method consulted on by Government in summer 2020 would lead to there being unmet need against emerging/existing housing requirements in **all but one** of the GBBCHMA authorities;
- Furthermore, the unmet need **post 2031** should be considered, as referenced to in the 2020 Position Statement. Based on data available at the present time and the most recent Local Plan figures, Barton Willmore calculate this to be a minimum **17,700 dwellings 2031-2040**.

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.