

14th December 2020

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Dear Sir/ Madam

Response to Solihull Local Plan Review (Regulation 19) Consultation

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

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

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

This submission relates to Land at Oakes Farm, Balsall Common and should be read in conjunction with the following documents:

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

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

Policy P5 Provision of Land for Housing***This policy is not considered sound or legally compliant for the following reasons***

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

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

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

- *The Council will allocate sufficient land for at least 5,270 net additional homes to ensure sufficient housing land supply to deliver 15,017 additional homes in the period 2020-2036. The allocations will be part of the overall housing land supply detailed in the table below.*
- *The average annual housing land provision target is 938 net additional homes per year (2020-2036). A trajectory showing how this target will be delivered from all sources of housing land supply is shown below. It will be subject to annual review through the AMR.*

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

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

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

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

- *Meeting Solihull's important regional and sub-regional role*

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

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

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

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

The representation prepared by Barton Willmore makes the following conclusions:

- As has been set out above, the policy fails to make it clear that the housing numbers proposed are a minimum figure.
- The Standard Methods minimum need for Solihull (807dpa) will need to be increased to account from expected job growth within the Borough.
- Modelling carried out by Barton Willmore shows that between 1,036 and 1,248 dpa. are required to support the UK Central Hub scenario
- Barton Willmore's calculations suggest that the deficit in unmet housing need from Birmingham City being delivered by HMA Local Plans amounts to a minimum of between 11,294 and 13,101 dwellings up to 2031, a significant increase from the 2,597 dwellings concluded on by the 2020 Position Statement. This increases when the unmet need from the Black Country is considered. Additional unmet need will be created post 2031.

As a result, this raises significant concerns on the housing numbers set out within policy P5. Therefore, settlements such as Balsall Common which have been identified as being able to accommodate housing growth beyond its own needs should have further land allocated within it to meet housing needs.

In this case, further consideration needs to be given to Land at Oakes Farm, Balsall Common. The NPPF is clear at paragraph 68 that *"small and medium sized sites can make an important contribution to the meeting the housing requirement of the area and are often built out relatively quickly"*.

Spitfire Homes has an option on Land at Oakes Farm, Balsall Common (site 304 in the Site Assessment October 2020). This site could help to meet the additional housing need identified within the representations from Barton Willmore. This site is located to the south west of Balsall Common and would sit comfortably within the built form of the settlement having regard to both existing development and proposed allocations. The chapter on Balsall Common within the Draft Submission Plan sets out at paragraph 521 that *“Balsall Common is one of two rural settlements in the Borough that has a full range of facilities including both secondary & primary schools, health services and a range of retail and associated facilities. As such it is well placed to accommodate levels of growth in excess of just its own local needs.”*

The Site Assessment document in respect of this site sets out that the *“Settlement identified as suitable for significant expansion, although site would have no defensible green belt boundary”*. An accompanying vision document has been prepared which demonstrates how development could be sensitively located on this site having regard to the site constraints. The site as it currently stands has very clear boundaries with Fernhill Lane marking the western boundary, Oakes Farm shop and hedgerows marking the southern boundary, and hedgerows on the eastern boundary with the B4101 running along the northern boundary of the settlement. Whilst in planning terms the site may be regarded as open countryside, its current and surrounding land use and visual character is such that it does not form part of the more functionally intact agricultural landscape to the south.

The Site Assessment document suggests that it *“is within moderately performing parcel in the Green Belt Assessment and would result in indefensible boundaries to the south and west”*

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

| Purpose | Green Belt Assessment Score | EDP Assessment | Comments |
|--|------------------------------------|-----------------------|---|
| To check the unrestricted sprawl of large built-up areas; | 1 | 1 | Both assessments score the same on this purpose. |
| To prevent neighbouring towns merging into one another; | 2 | 0 | Development would not bring the settlement edge of Balsall Common any close to either Kenilworth to the south east or any of the smaller settlements to the south and west. |
| To assist in safeguarding the countryside from encroachment; | 2 | 1 | The site is well associated with the existing settlement edge and is contained by residential or commercial development on all sides. In this context, |

| | | | |
|---|---|---|--|
| | | | the site does not have a strong sense of countryside in which to encroach. |
| To preserve the setting and special character of historic towns | 0 | 0 | Both assessments score the same on this purpose |
| Total: | 5 | 2 | |

It is acknowledged that land is proposed to be developed as part of this plan at Frog Lane for 110 dwellings (policy BC2). As part of the assessment prepared by EDP, they have also assessed the Frog Lane site, and this demonstrates that the Frog Lane site performs a stronger purpose against three of the tests compared to the Oakes Farm site. With regard to those performances, it was considered that development of the site is likely to have a particular effect on the rural character and setting of Frog Lane to the south and east.

The Oakes Farm site is in a highly sustainable location with a bus stop within 400 metres of the site, and the centre of Balsall Common within a 10-15 minute walk, and both a primary and secondary school no more than 1.3km from the site. As is set out within the vision document there is currently an abrupt settlement edge to Balsall Common in this location and development at Oakes Farm would allow this to be softened albeit clearly defined and defensible. The strategy within the masterplan provides a number of key principles including a significant landscape buffer, which provides a transition from urban to rural as well as ensuring there is a robust and defensible boundary to the Green Belt. Within the site, it is proposed to integrate existing public rights of way ensuring good connections to the centre of Balsall Common village centre. In addition, there are opportunities to provide significant ecological improvements to the site.

This site is available immediately and is being actively promoted by Spitfire Homes. Apart from the site’s location within the Green Belt, there are no known constraints which would prevent development of the site. This site can easily be delivered within the next five years providing much needed additional housing within the Borough. As has been demonstrated within the accompanying appraisal by EDP, the Oakes Farm site could reasonably be removed from the Green Belt and developed in accordance with the sound masterplanning principles without harm to the integrity of the Green Belt overall.

Modifications required to make the plan sound

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

Consideration also needs to be given to the inclusion of Land at Oakes Farm as an allocation within the plan.

Appearing at the Examination

It is confirmed that Ridge and Partners would wish to appear at the examination for the reasons set out above.

Concluding Comments

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

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

Yours faithfully



Guy Wakefield MRTPI

Partner

For Ridge and Partners LLP

Enc.

- Oakes Farm Vision Document prepared by Turleys
- Environmental Appraisal prepared by EDP
- Solihull Borough Needs Report prepared by Barton Willmore

OAKES FARM

Balsall Common

Vision Document

December 2020



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bespoke homes

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Date of issue

December 2020

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INTRODUCTION

This vision document has been prepared by Turley on behalf of Spitfire Bespoke Homes. It demonstrates the potential for residential development on land at Oakes Farm, Balsall Common.

The document seeks to present a vision for the suitability of releasing the site, currently designated as Green Belt land for residential development and to help create a new sustainable settlement edge to Balsall Common, responding positively to the existing landscape context.

Balsall Common is located in the Borough of Solihull and is a settlement near Solihull, Birmingham and Coventry. The village extents are encompassed by the Green Belt.

Balsall Common is a popular place to live, with local facilities and services and readily available connections to Coventry, Warwick and Birmingham via bus rail cycle and car.

The vision for Oakes Farm is to deliver a high quality residential development, and create an area of accessible public open space and amenity, set within close proximity to existing facilities and services as well as sustainable transport modes.

An illustrative masterplan will demonstrate the suitability and deliverability for development in response to wider and site specific considerations.





Figure 1: Illustrative image of potential central open space

SPITFIRE BESPOKE HOMES

WHO WE ARE

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

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

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

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





ASSESSMENT

SITE LOCATION

The site is located to the south of Balsall Common and is within the Solihull administrative boundary. It serves as a key village for Birmingham and Coventry.

Balsall Common has connections to Solihull approximately 8.3km and Birmingham 23km to the west. Coventry is approximately 12km to the east, and Warwick and Leamington Spa are located approximately 13km to the south.

The village is accessible to the M40, M42 and M6, allowing for wider strategic connections to other regions of the UK.

SITE DESCRIPTION

The site is located on the southern fringe of Balsall Common and is approximately 7.78ha in area. The site is currently in agricultural use. There is an existing bungalow to the north west, that has an access on to the Balsall Street (B4101), along the northern boundary. There is also an existing access road onto B4101 Balsall Street. The access road cuts through the site and connects to Oakes Farm buildings and Shop to the south.

The site slopes north and south from a high point that runs east west. The highest point is approximately 124m above ordnance datum (AOD).

All of the site boundaries are clearly defined by existing built form.

The north of the site abuts the B4101 Balsall Street. The boundary is lined by existing vegetation.

The eastern boundary is defined by existing vegetation, with Fernhill Court Business Park lying beyond this. A Public Right of way runs parallel to the boundary and dog legs into the site.

The eastern section of the southern boundary is adjacent to Oakes Farm Shop, whilst the western section consists of an existing residential property and an open field.

The western boundary abuts Fernhill Lane and is lined by existing trees and hedgerow. Existing residential development lies beyond this.

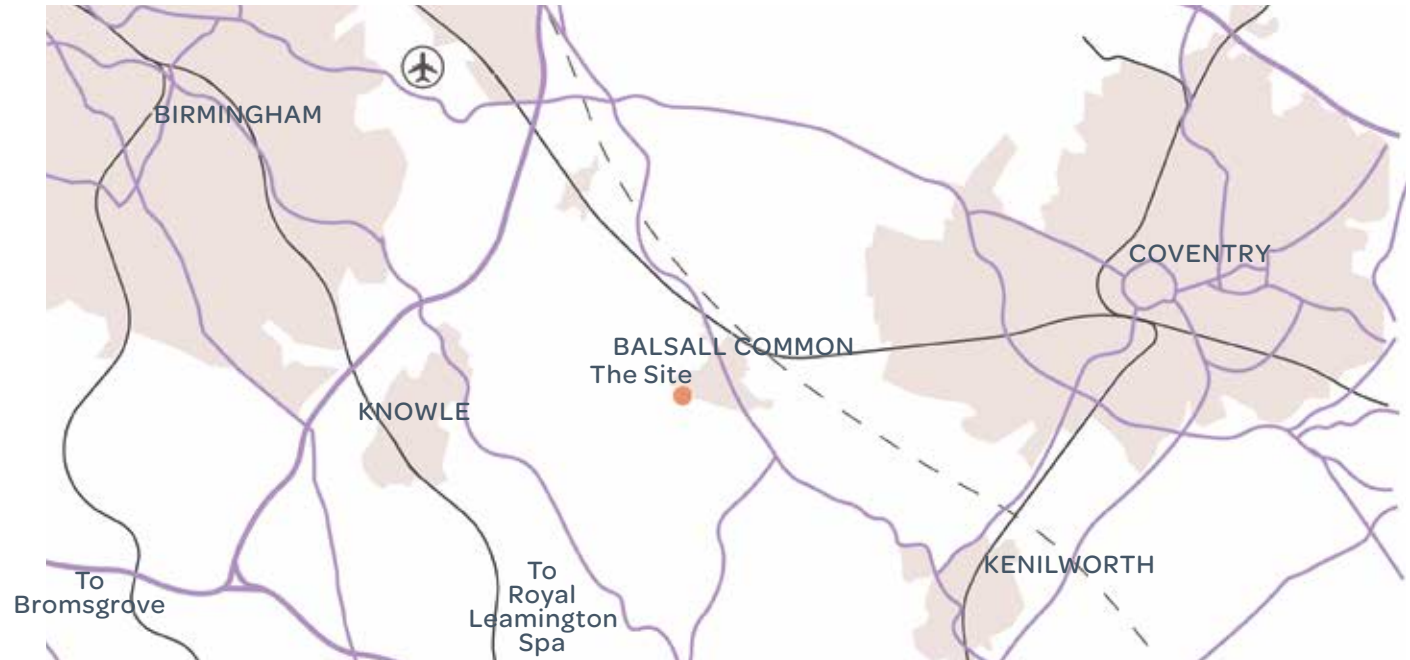


Figure 2: Regional Context Plan



B4101 Balsall Street

BALSALL COMMON

Fernhill Lane

B4101 Balsall Street

Fernhill Lane

The Site

Fernhill Court
Business Park

Oakes Farm
Shop

- Site Boundary
- Public Rights of Way
- Open Fields with Vegetation
- Existing on site Building
- Existing Road

Figure 3: Site Location Plan

PLANNING POLICY OVERVIEW

Local Plan - Balsall Common

The emerging Local Plan Review reflects the potential for settlements such as Balsall Common to accommodate housing growth. This is illustrated by the fact that Balsall Common has over recent years been the subject of allocated and committed housing development, and continues to be identified as a location for growth through the allocations within the Draft Local Plan.

The Draft Local Plan currently identifies 1,615 dwellings will be delivered at Balsall Common across 6 sites. These sites are;

- Frog Lane (Richborough Estates)
- Windmill Lane (Catesby Estates)
- Barratts Farm (Greenlight Landholdings)
- Pheasant Oak Farm (Privately Owned)
- Trevallion stud (predominantly Council owned)
- Lavender Hall Farm (predominantly Council owned)

In order to establish the degree of robustness and deliverability of the proposed allocations high level analysis and concept masterplans for each of the site allocations in the local plan have been developed (Solihull Local Plan Concept Masterplans - October 2020).

Solihull Local Plan - Draft Submission Plan

The Solihull Local Plan - Draft Submission Plan (October 2020) identifies Balsall Common as within the Borough's rural area. The Local Plan Review acknowledges that Balsall Common is a large post-war suburban village, characterised by low density residential areas with open plan, cul-de-sac style layouts. The village is identified as having a thriving local centre and accessibility to Berkswell railway station to the north-east of the village provides access to London, Birmingham and Coventry.

Draft Policy P5 'Provision of Land for Housing' establishes that the Council will allocate sufficient land to deliver 15,017 dwellings (938 net dwellings per annum) during the period 2020-2036. The Policy establishes that new housing will be supported on identified sites in accessible locations where they contribute towards meeting borough-wide housing needs and towards enhancing local character and distinctiveness. New housing developments will be required to make the most efficient use of land whilst providing an appropriate mix and maintaining character and local distinctiveness.

The subject site, whilst not a draft allocation, is a very suitable site for development. Like all the other major greenfield housing allocation sites in the draft Local Plan, it is currently located in the Green Belt. It benefits from readily defensible boundaries and there is the ability to reinforce those boundaries as shown on the masterplan later on. Overall the development of the site can come

forward whilst avoiding significant harm to the openness of the Green Belt whilst providing a logical extension to the existing built form. The site is in a sustainable location relative to its proximity to shops, services and employment opportunities by sustainable modes of transport.

The site therefore provides an ideal housing allocation should it be decided that one or more other existing allocations aren't suitable or that the housing requirement figure needs to be increased.





Figure 4: Site Allocations Plan

ACCESS & MOVEMENT

Vehicular

The site lies to the south of the B4101 Balsall Street. The main access into the site will be gained from the existing access point that currently leads to the Farm Shop, south of the boundary. Connectivity to the shop will be retained through the development proposals, to support this retained business for new and existing customers.

The B4101 Balsall Street allows for access to the A452. This provides connections to into Birmingham to the North and Warwick and Leamington Spa to the south (via A4177).

The A452 allows for connections to the M40, M42 and M6, that provide connection to other regions of the UK.

Access into Coventry can be gained via Station Road and Truggist Lane, connecting to the B4101 Tanners Lane.

Public Transport

There are a number of bus stops located within close proximity of the site, with the nearest within 400m along the B4101. These are services 88A and 233, which provide connection into Solihull, Kenilworth and Balsall Common village centre. Services 87 and 87A provide access into Coventry.

Berkswell train station is located approximately 1.6km to the north of the site. This provides access into Birmingham Northampton and London. These stations also allow for wider connections in the UK.

The Planned route for the HS2 runs to the east of Balsall Common. The site does not fall within 300m of the consultation zone.














PRoW Network

There is an existing Public Right of Way (PRoWs) that runs along the eastern boundary of the site and partially enters the site. This runs south and eventually connects to Fernhill Lane. This will be retained and incorporated into the proposals for the site.

There are a number of PRoWs in close proximity of the site and with the wider context, providing access into the surrounding countryside.

International

The site is closely located to Birmingham Airport, approximately 10.5km north of the site and can be accessed by the A452. There is also a direct train to the Airport. The sites close proximity allows for international travel.

-  Site Boundary
-  Extents of Balsall Common
-  Village Centre
-  Site Allocations
-  A Roads
-  B Roads
-  Local Roads
-  Railway Track
-  Proposed HS2 Route
-  Indicative Bypass
-  Public Rights of Way
-  Bus Stops
-  Railway Station

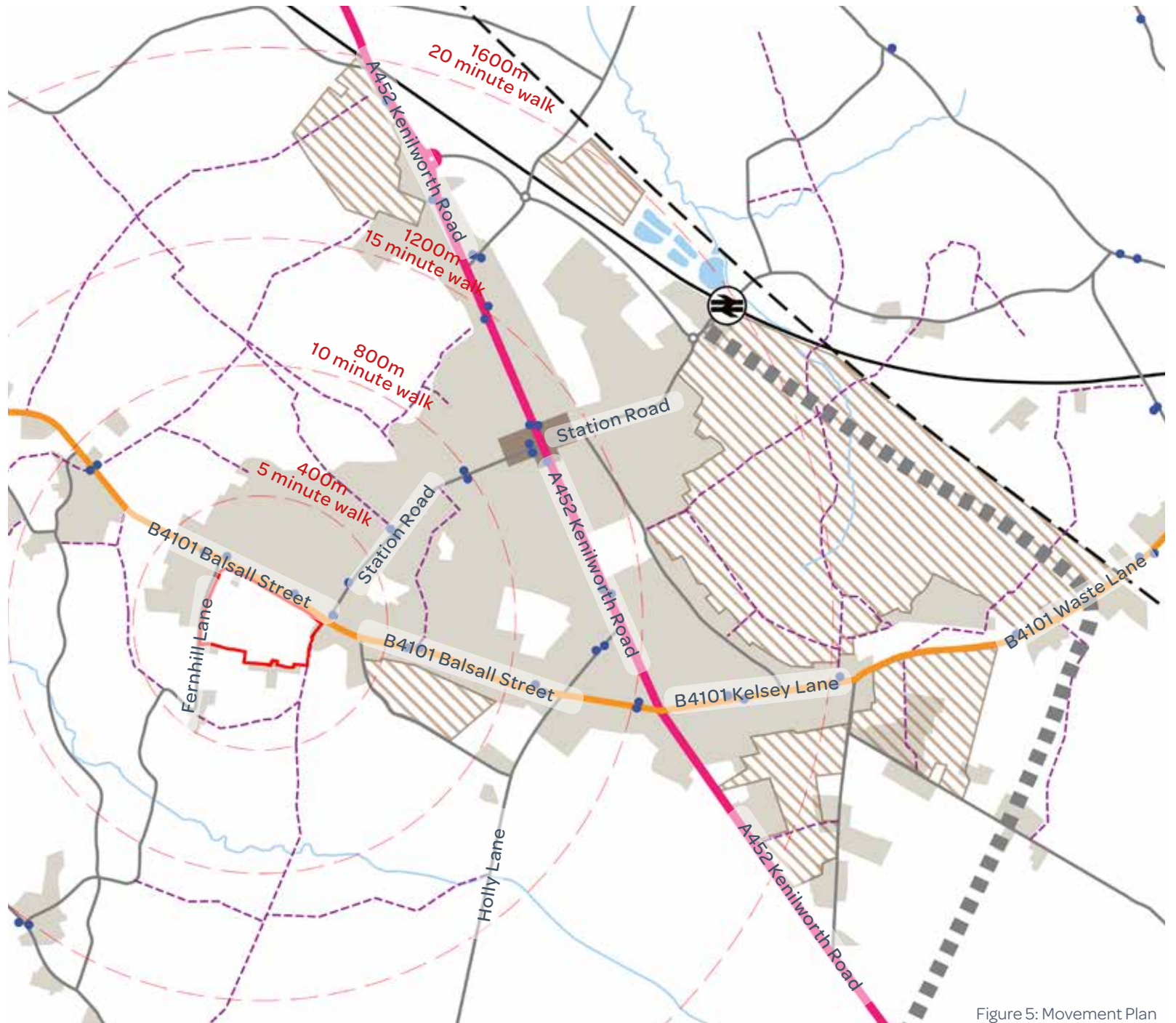


Figure 5: Movement Plan

FACILITIES & SERVICES

The site is well situated in close proximity to a range of facilities and services, with most being no more than a 20 minute walk. There is a concentration of facilities and services such as local restaurants and food shops within the village centre. Some key facilities and services include;

- Tesco Express
- Costa Coffee
- Balsall Common Post Office
- One Stop
- Balsall Common Library

Other food shops within the village include a co-operative food, Sainsbury's Local and Oakes Farm Shop.

Education

There are two schools located within Balsall Common and are no more than 1.3km from the site. These are;

- Heart of England Secondary School & Sixth Form
- Balsall Common Primary School

Warwick, Coventry and various Birmingham universities are located within driving distance of the site, or are easily accessible by public transport.

Health

Balsall Common Health Centre is located approximately 1.6km to the north of the site. Balsall Common Dental Practice is also located along the A452 and is within a 20 minute walk.

Open Space and Leisure

There are a number of amenity and leisure facilities located close to the site. These include;

- Willow Park
- Berkswell & Balsall Common Sports Association
- Balsall Common Badminton Club
- Lavender Hall Park
- Lavender Hall Fishery
- The Lant Trust playing Field/ Berkswell & Balsall Common Sports Association

There are additional facilities and services in the nearby cities, allowing for wider opportunities, as well as access to a greater range of open space and leisure facilities. These can be accessed via sustainable public transport modes.

- Site Boundary
 - Extents of Balsall Common
 - Village Centre
 - Green Space/Amenity
 - Site Allocations
1. Oakes Farm Shop
 2. Fernhill Court Business Park
 3. Playing Field
 4. Balsall Common Primary School
 5. Heart of England School
 6. The White Horse Pub
 7. The Lant Trust Playing Field/
Berkswell & Balsall Common Sports Association
 8. The medical Advisory Centre
 9. Meeting House Lane Park
 10. Bengal Brasserie
 11. Village Hall
 12. McKees Brasserie
 13. Willow Park
 14. Ye Olde Saracens Head Pub
 15. Lavender Hall Park
 16. Balsall Common Health Centre
 17. Balsall Common Dental Care
 18. The Brickmakers Arms Pub
 19. The Royal British Legion Pub
 20. Co-Operative Food
 21. George in the Tree Beefeater
 22. The Lavender Cafe/Lavender Hall Fishery

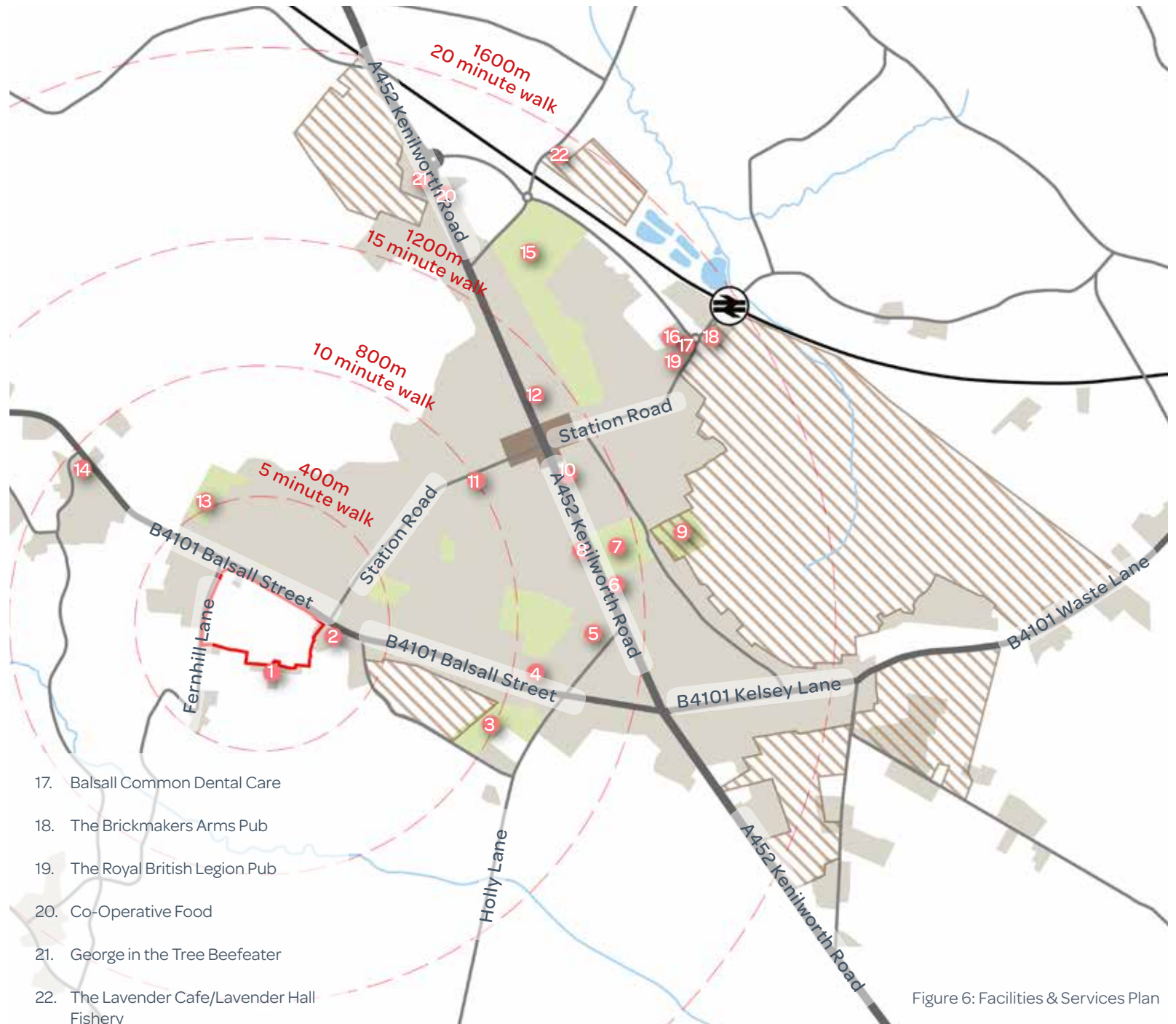


Figure 6: Facilities & Services Plan

LANDSCAPE & VIEWS

Landscape Overview

The site is set within the Solihull Metropolitan Green Belt. It is enclosed by the urban edge of Balsall Common to the north east and west. The village itself does not lie within the Green Belt.

The site does not contain any other identified designations but does however fall within 3km of;

- Preceptory at Temple Balsall Scheduled Monument
- River Blyth SSSI
- Ancient Woodlands
- Four Grade II listed buildings within the immediate context of the site
- Three Conservation Areas including Berkerwell, Barston and Temple Balsall

Green Belt

An assessment has been undertaken in relation to the site and how its features contribute to the key 'purposes' of the Green Belt.

There is opportunity for site to be released from the Green Belt and developed without significant adverse effects to

the designation. Masterplanning principles will be designed to work harmoniously with the existing landscape context and promote a scheme that presents a more distinctive urban edge to Balsall Common.

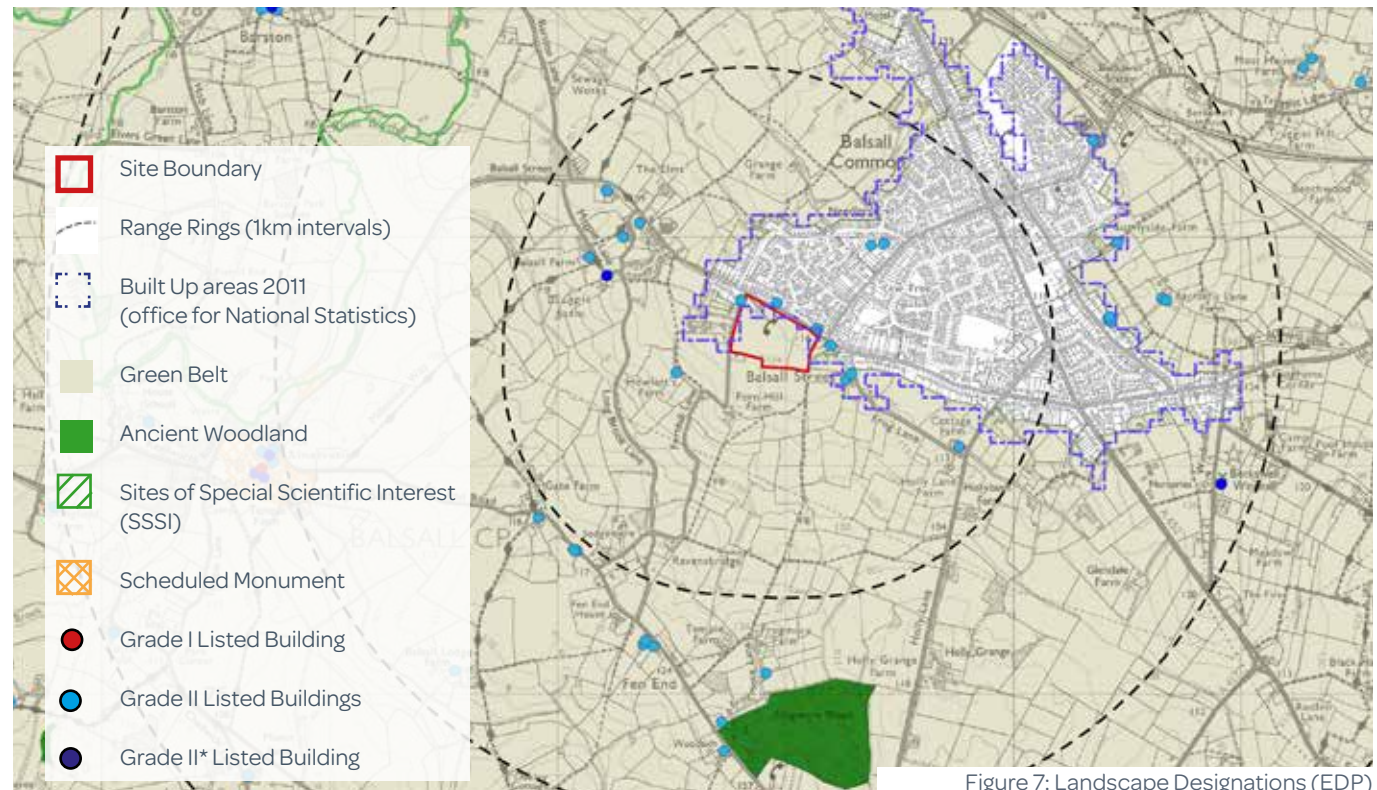


Figure 7: Landscape Designations (EDP)

Landscape Setting & Views

The site is within the NCA 97 'Arden' which can be described as gently rolling with small fragmented semi-natural and ancient woodlands.

The site falls within LCA 4 'the rural heartland of Solihull' which is outlined in the 'Solihull Borough Landscape Character Assessment'. The local area is identified by its predominance of agricultural, arable and pastoral land uses.

The site is relatively open with intervisibility across the site, and glimpsed views to the northern settlements. The sites existing vegetation helps to contain the site on all boundaries.

Key views into the site will be from the existing properties to the north which are within a suburban setting and do not have rural qualities. There will also be views from the existing on site bungalow and from the existing PROW to the east.

The general topography of the area allows for some containment of the site, with the existing halfway ridge line differentiating between suburban and rural.



Figure 8: Landscape Considerations (EDP)

URBAN MORPHOLOGY

The development of Balsall Common has occurred gradually over time. Originally the area consisted of smaller hamlets up until the early 1900s, and were focussed along the key routes of Kennilworth Road, Balsall Street and Station Road.

From the 1950's, development has predominantly been infill projects in between key routes. The result of urban sprawl led to the merging of these smaller areas into one conurbation.

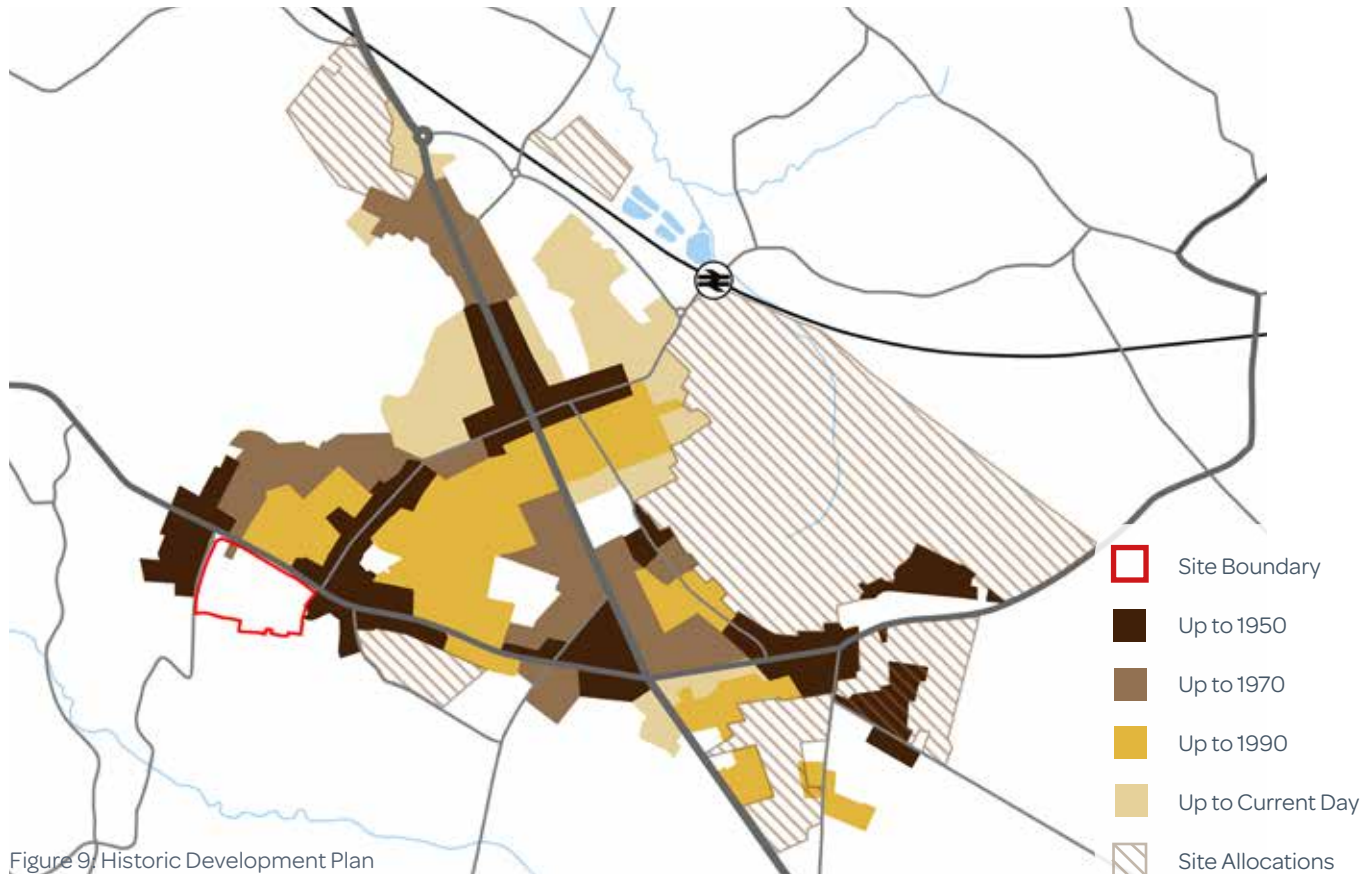


Figure 9: Historic Development Plan

A Logical Extension to Balsall Common

The site is situated to the south of the existing settlement edge of Balsall Common. The site presents an opportunity to create a new softer edge to the existing settlement boundary that responds positively to the rural context.

The site responds to existing settlement patterns, being located on one of the key routes on which Balsall Common was originally formed. Development of the site would reinforce these characteristics of urban expansion.

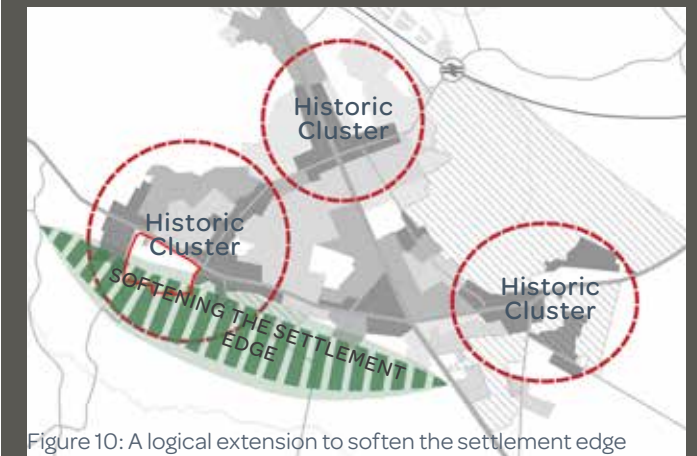


Figure 10: A logical extension to soften the settlement edge

Heritage

There are Grade II listed buildings within the immediate context of the site. These are located along Fernhill Lane and Balsall Street and include;

- Wisteria Cottage
- Shenstone Grange
- Hobbe Cottage
- Barn at Balsall Street Farm

A full heritage impact assessment will be required should any planning application go forward to ensure the setting of these heritage assets are not adversely impacted.



Figure 11: Shenstone Grange



Figure 12: Barn at Balsall Street Farm



Figure 13: Wisteria Cottage



Figure 14: Hobbe Cottage

CONSTRAINTS & OPPORTUNITIES

Boundaries

The north of the site abuts the B4101 Balsall Street. The boundary is lined by established trees and hedgerow. There is an existing access point taken that leads to Oakes Farm Shop beyond the southern boundary.

The eastern boundary is lined by trees and hedgerow. There is an existing Public Right of Way that runs parallel to this boundary and dog legs into the site. This will be accommodated within the masterplan proposals.

The southern boundary abuts the Oakes Farm Shop, there are some trees and hedgerow located along this boundary. There is an existing property located to the south east beyond the boundary.

The western boundary of the site is lined by thick vegetation. Fernhill Lane lies beyond this.

The masterplan should seek to respond positively to the existing boundaries of the site and retain and enhance its existing features.

Topography

The site slopes to the north and south from a ridge near the southern boundary, which is approximately 124m AOD. The masterplan will should seek to work with the existing topography of the site and propose a scheme that responds positively to the sites existing topographical context.

Landscape & Visual Impact

The current topography of the site allows for some visual containment. There are likely to be partial views from the existing properties to the north and well as partial views from the existing PRoW to the east.

There is currently an abrupt settlement edge to Balsall Common. There is opportunity for the masterplan to create a softer urban edge and create a scheme that knits into the existing urban fabric and provide a transition from urban to the sensitive rural setting.

Trees & Hedgerow

There are existing trees and hedgerow that line all of the boundaries of the site, as well as an internal hedgerow that defines a field parcel. There is opportunity to incorporate the sites existing vegetation into the masterplan proposals as well as provide additional planting to help create a pleasant environment to live in and integrate it within the landscape context.

Ecology

The sites existing trees and hedgerow are likely to provide potential habitats for certain species. Surveys will need to be undertaken as part of any future planning application. The proposed development will seek to preserve, where possible, and enhance existing ecological features.

Flood Risk & Drainage

The site is situated within Flood Zone 1, meaning that it is at low risk of flooding from rivers or the sea. Nor is the site subject to surface water flooding. The masterplan will integrate appropriate drainage strategies into the proposals to ensure there is no adverse impact from surface water flooding.

Flood mitigation will be in the form of Sustainable Urban Drainage Systems (SUDs), which will be located at the north and south west of the site.

The existing public storm sewer within Shenstone Drive to the north boundary of the site is the most viable surface water outfall location and surface water attenuation can be facilitated within the proposed public open space. The discharge rates from the site will be restricted to greenfield run-off rates. This will ensure that drainage for any proposed development will be managed on site thus ensuring there is no flood risk created that would affect the existing area around the site of the proposed development itself. Suitable planting within the attenuation basin would enhance the site's biodiversity with wet habitats for species.

Access

There is an existing access taken from the B4101 Balsall Street, providing access to the Oakes Farm shop to the south of the site. This access will be retained as part of the proposals.

There is an existing PROW that enters the eastern boundary of the site. There is opportunity to integrate this into the wider masterplan proposals.

Existing Buildings

There is a mid-late 20th century building located on site to the north east. This will be retained and incorporated into the masterplanning proposals.

Utilities and Services



















Potable water, gas, electric and telecoms mains are all readily available within Balsall Street to supply the site. An existing public foul sewer flows south to north along the sites western boundary and connects with another foul sewer flowing east to west within Balsall Street. These foul sewers will be retained in-situ and are the most viable foul outfall location. Overhead High Voltage electric cables run through the centre of the site and connect to a sub-station sited on the northern boundary. A below ground telecoms cable runs through the centre of the site. Diversion works will be required to the electric and telecoms apparatus, but otherwise the site is well served with existing utilities that could supply any proposed development.

Heritage

There are a number of Grade II Listed buildings located in close proximity to the site. There is opportunity for the masterplan to provide an appropriate buffer from these buildings and propose less dense development that face these designations.

KEY DESIGN CONSIDERATIONS

- The site has the opportunity to create a more distinctive settlement edge to Balsall Common, that responds positively to the existing landscape context.
- Consideration will be given to the existing listed buildings located in close proximity to the site.
- The site is within the Green Belt. However, the development of the site will respond positively to the existing landscape setting.
- The existing PROW that enters the site will be integrated into the masterplan linking to the existing comprehensive pedestrian network.
- The masterplan will implement an appropriate landscape and green infrastructure strategy, which will include sustainable drainage systems.
- The scheme will retain and enhance the sites existing trees and hedges, where possible, and provide additional planting to help support and increase the sites ecological value.

-  Site Boundary
-  Public Right of Way
-  Existing Site Access
-  Existing Access Road
-  Potential Pedestrian Access
-  Bus Stops
-  10m Contours
-  General Fall of the Land
-  Grade II Listed Buildings
-  Existing Trees and/or Hedgerow (subject to further assessment)
-  Indicative SUDs Location
-  Indicative Play Space Location
-  Existing electricity transmission line
-  Existing Substation
-  Existing Public Foul Water Sewer
-  Existing On Site Building
-  Views in/out of the Site
-  Potential Landscape Buffer



Fernhill Lane

B4101 Balsall Street

B4101 Balsall Street

Fernhill Lane

Oakes Farm Shop

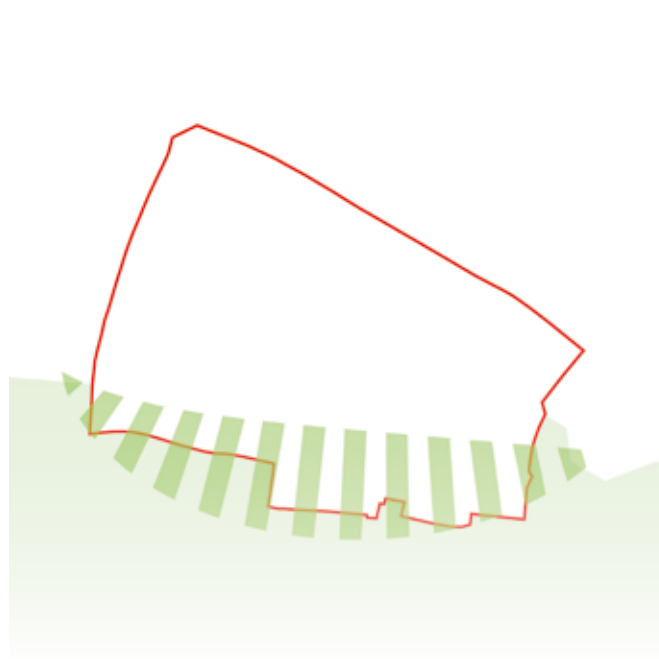
Figure 15: Site Constraints Plan

DESIGN PRINCIPLES



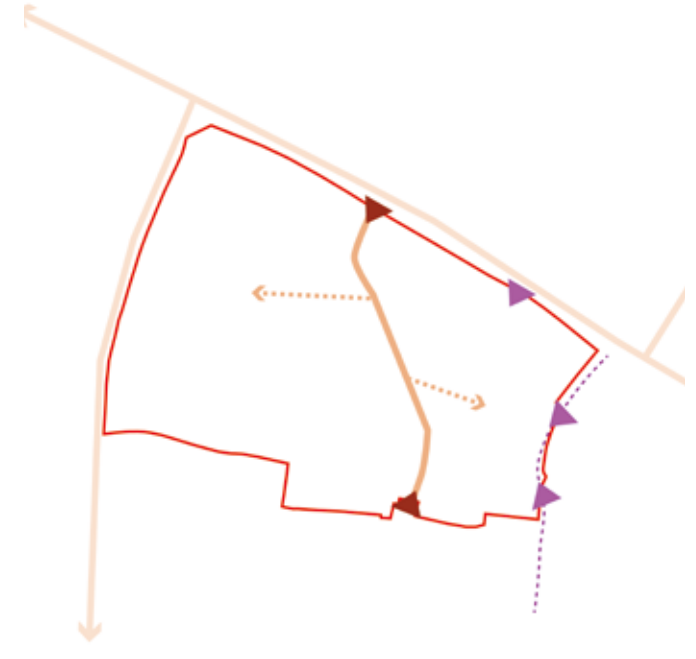
Extension to Balsall Common

The site lies to the south of the settlement edge of Balsall Common. There are also development parcels to the east and west. There is opportunity to extend the current urban edge and create a transition from urban to rural.



Response to Green Edge

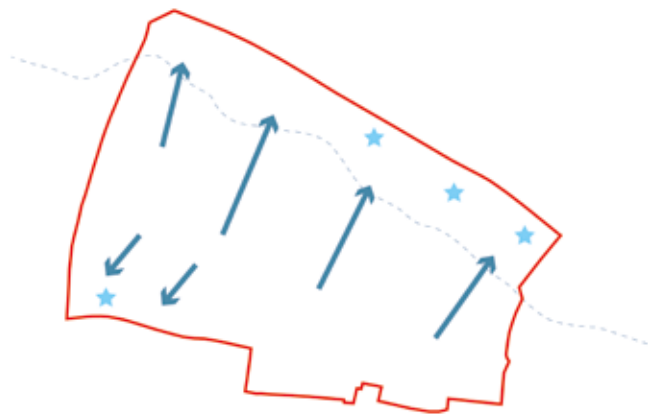
The site is currently situated within Green Belt. The masterplan should seek to be designed to respond positively to the existing landscape context. An appropriate buffer will be provided between development proposals for the site, and from the Green Belt. Less dense development will be located on the southern parcels to respond positively to existing rural characteristics.



Connections

There are existing access points into the site that connect to the Oakes Farm shop to the south. There is opportunity to partially incorporate the existing road into the masterplan and utilise the existing access points.

There is a PRoW that dog legs into the site to the east. There is opportunity to utilise the pedestrian connection and incorporate it within the masterplan proposals.



Drainage & Topography

The site slopes to the north and south with a ridge located near the southern boundary. The masterplan will propose a sufficient flood management strategy to mitigate against surface flood risk.

Sustainable Urban Drainage Systems will be incorporated into the proposed site masterplan to deal with both surface water run-off and provide an opportunity for biodiversity enhancement.



Landscape & Ecological Assets

The site boundaries contain existing trees and hedgerow and there is an existing hedgerow that divides the site. The masterplan will retain and enhance all of the sites vegetation, where possible, and enhance them to help create a scheme with added ecological value.



THE DESIGN

THE PROPOSALS

- The masterplan illustrates how development could be accommodated on the site, taking into consideration the technical assessments that have been undertaken.
- The proposed scheme is reflective of the existing context, character, massing and scale, offering high quality homes with a range of type and tenure, to help address housing need.
- The masterplan takes into consideration the existing context of the Green Belt and proposes a masterplan that responds positively to this, by creating a new settlement edge to Balsall Common that respects and works harmoniously with the existing landscape context.
- The proposed scheme seeks to ensure that all trees and hedgerow are retained, where possible, and enhanced through additional planting in green spaces, key nodes and by providing street trees, to help create a more pleasant environment to live in.

- The masterplan will utilise the existing access point taken from the B4101 Balsall Street, and create a key route to the existing Oakes Farm Shop to the south of the site. The proposals will create a route consisting of tree-lined avenues and informal spaces to create a pleasant approach to the existing community asset.
- Existing pedestrian routes will be utilised and incorporated into the masterplan to help encourage an active community and reduced the reliance on motorised vehicles. Roads will also be designed with low vehicle speed to help encourage cycling.
- An appropriate amount of green space will be provided within the scheme, this will be in response to the landscape context as well as having a degree of ecological importance. Biodiversity on site will be retained, where possible, and enhanced, to encourage wildlife to use the site. Play spaces will also be provided in the scheme and will be appropriately located, close to housing.

- 1 Primary Access Point to be taken from B4041 Balsall Street
- 2 Key Frontage & higher density development along tree lined primary routes
- 3 Lower density development located along the fringes of the development, facing public open space
- 4 Key Spaces with feature buildings
- 5 Existing hedgerow and trees to be retained and enhanced to create a ecological green corridor
- 6 Potential for nature play to run along the southern of the site, within the landscape buffer
- 7 Surface water attenuation features
- 8 Potential for wet attenuation features and landscaping to create additional ecological value
- 9 New pedestrian connections
- 10 Additional planting within landscape buffer
- 11 Existing onsite building to be retained
- 12 Proposed central green space



Figure 16: Planning Layout

MASTERPLAN STRATEGIES



A logical extension to Balsall Common

The masterplan lies immediate adjacent to Balsall common, with existing development also to the east and west. The proposals form a natural extension to the village and creates a new settlement edge, responding positively to the Green Belt.



Providing Sustainable Connections

The existing PRoW will be retained and integrated into the masterplan. New pedestrian connections are proposed to help create a comprehensive pedestrian network, connecting to Balsall Common Village Centre

Primary Access will be taken from the B4101 Balsall Street and will serve the whole development. An existing bus service is located within 400m of the site and provide wider strategic connections.



Amenity & Play

The sites public open space has opportunity to provide spaces for both informal and formal recreational activity. This will likely be in the form of natural play spaces and will be located close to development blocks for natural surveillance and safety.



Enhanced Green Infrastructure

The masterplan retains existing trees and hedgerow where possible, allowing for the scheme to integrate within its existing landscape setting. Added planting is providing within public open space, to help create a more pleasant environment and encourage walking and cycling.

There will be attenuation basins located to the north of the site, to mitigate against surface water flood risk.



Ecological Connections

The masterplan retains existing trees and hedgerow where possible, as well as provide additional planting which will have a degree of ecological value. This will help to promote the level of biodiversity within the site and increase the overall ecological value.



Overall Strategy

Development parcels are situated in between landscape and movement features of the scheme. These parcels are designed to be outward looking perimeter blocks facing key movement routes, or open space.

The public open space has been designed to have also have a degree of ecological value to encourage wildlife to use the site. Play space, flood mitigation and landscape buffering and recreation has also been provided.

LANDSCAPE STRATEGY

The masterplan seeks to promote a Green Infrastructure strategy that positively responds to the sites existing Green Belt context.

The masterplan proposes a rural green edge environment, providing new formal recreational facilities for younger people that use the site.

New pedestrian routes will be incorporated into the open green space and will be connected directly to the existing PROWs to create a comprehensive pedestrian network to promote walking.

Biodiversity net gain will be delivered as an integral part of the green infrastructure design. This will be done through means of ecological enhancement, by providing additional planting with native tree species as well as species-rich flora, to help encourage wildlife to use the site.

The masterplan will accommodate SUDs within the scheme to tackle any adverse risk from flooding, as well as accommodation for climate change. Permanently wet attenuation basins will help to provide a variety of flora and fauna within the site, increasing the masterplans ecological value as a whole.



- 1 Significant Landscape buffer to create a transition from urban to rural
- 2 Green corridors to be retained and enhanced.
- 3 Appropriate mitigation for the setting of the existing listed buildings through landscape buffering and low density design.
- 4 Key spaces to be located along key primary routes to create nodal spaces and act as speed reducing features.
- 5 Attenuation features to be incorporated at the lowest parts of the site.

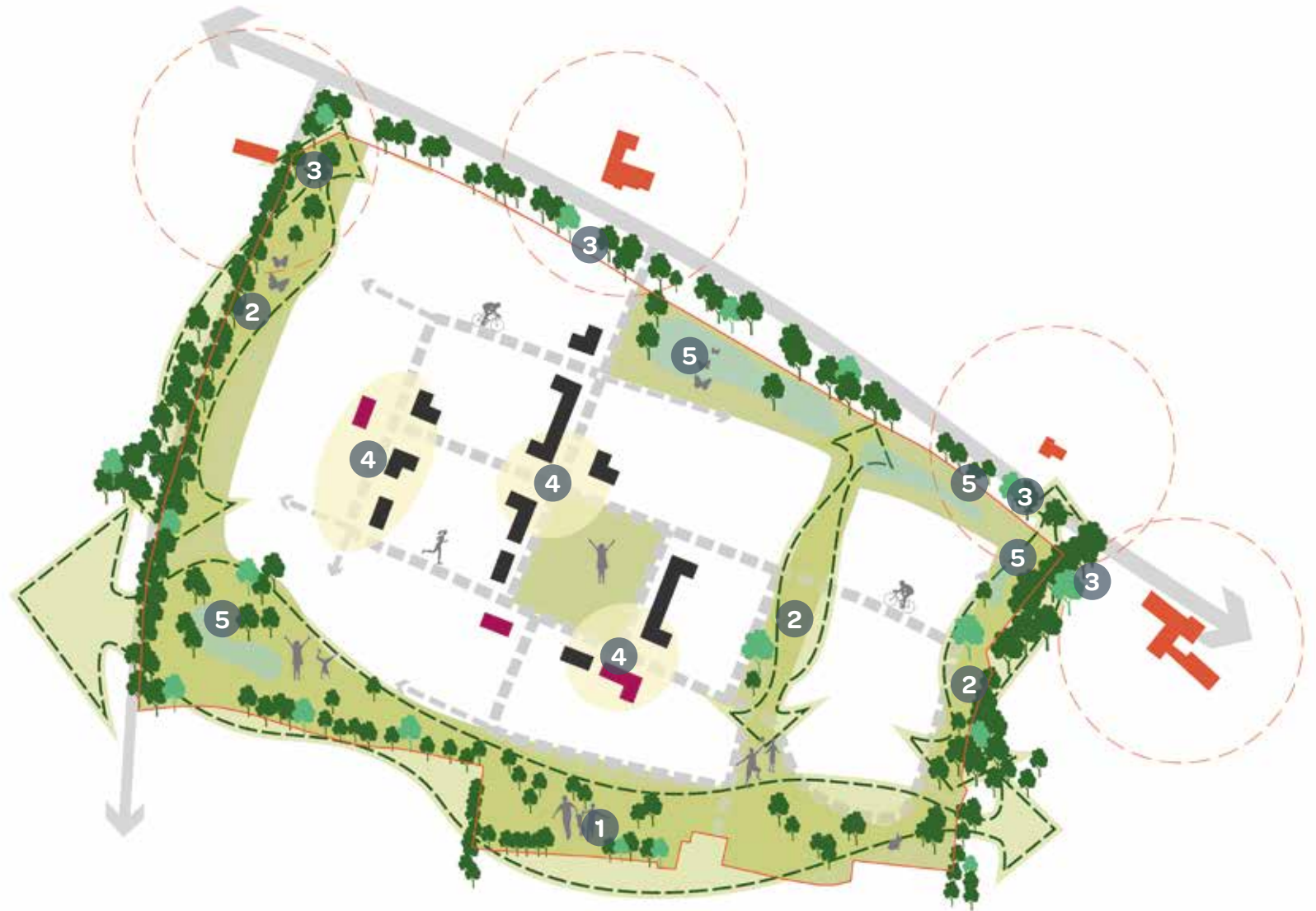


Figure 17: Concept Plan

CHARACTER AREAS

Development Core

The scheme will propose a series of key spaces throughout the masterplan. The development core will be a significant key space within the development. The central green will be distinctive for its surface treatment and central green space to accommodate play.

There will be additional planting within the green area, as well as tree-lined avenues within the street scene. Units are proposed to be higher density and will enclose the spaces, with key buildings being located at the end of avenues and will help to create vistas through the development.





Tree-lined avenues

High quality surface treatment

Key frontage

Green space with indicative formal play area

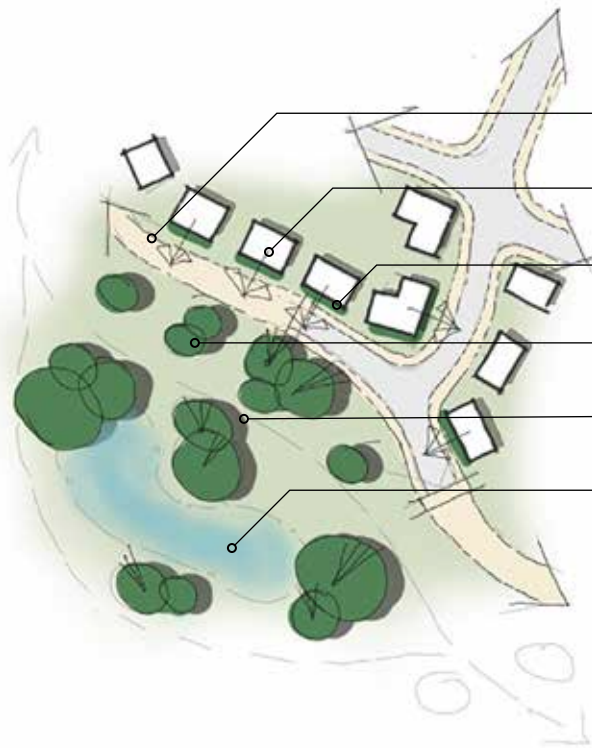
Higher density development

Green Edge

Development that faces the newly defined settlement edge of Balsall Common will be less dense, with key frontage looking out onto the rural setting. These facades will be carefully designed to reflect the rural character of the countryside. Roads will predominately be shared surface with high quality materials being used.

Pedestrian routes will be proposed throughout the public open space, as well as additional planting to help create a pleasant rural environment and promote walking and informal play.





High quality shared surface/private drives

Key frontage overlooking green space

Low hedgerow boundary treatments

Additional planting within green space

Indicative pedestrian routes

Potential for SUDs to be integrated into the landscape strategy



Responding to the Existing Onsite Building and Context

The masterplan will seek to respond positively to the retained onsite building. This will be done by proposing key frontage facing onto on the primary route, and ensuring units back onto the property, providing a sufficient amount of privacy.

The masterplan proposes to have units fronting onto the western green corridor. These units will be less dense and rural in character to respond positively to the setting of the listed building to the west. Additional planting will be provided to behave as a buffer.

Properties will also face onto the B4101 to help provide a positive aspect to the road.





Frontage onto B4101 Balsall Street

Existing property

Less dense development

Properties backing onto existing building

Key frontage



RESPONSE TO CLIMATE CHANGE

Background

The special report on Global Warming of 1.5°C from the Intergovernmental Panel on Climate Change (IPCC) published in October 2018 set out that human activities are estimated to have caused approximately 1.0°C of global warming and this is likely to increase to reach 1.5°C between 2030 and 2052 at its current rate. Limiting warming to 1.5°C requires major and immediate action.

The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for.

In May 2019, the UK Government declared a climate emergency and in June 2019 the Government amended the Act to set a new legally binding target of net zero carbon emissions by 2050, the world's first major economy to do so. In relation to this, SMBC also declared a climate emergency in order to demonstrate its commitment to taking action on climate change.

Balsall Common Adaptation and Mitigation

It is evident there is a need for the development to consider measures to mitigate and adapt to climate change. Our Client is committed to delivering a resilient low carbon development and aims to deliver an ambitious strategy to mitigate the effects of climate change through reducing carbon emissions of Land at Oakes Farm.

The following section outlines how the development will aim to incorporate a range of measures to adapt to and mitigate the impact of climate change.

Passive Design

As a result of climate change, summer maximum temperatures are predicted to increase; during the design of Land at Oakes Farm, a Cooling Hierarchy will be considered. Measures may include:

- Appropriate orientation of homes and buildings;
- Reduced window area to balance daylighting and overheating risk;
- External shading;
- High albedo materials;
- Window overhangs;

- Glazing design with openable windows to encourage cross ventilation to reduce mechanical cooling demand;
- Passive cooling; and
- Passive ventilation.
- Energy Use

The built environment contributes around 40% of the UK's total carbon footprint. In order to reduce the carbon footprint of buildings at Oakes Farm, the scheme will aim to:

- Be lean: use less energy and manage demand during operation through fabric and servicing improvements and the incorporation of flexibility measures;
- Be clean: supply energy efficiently and cleanly where appropriate;
- Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site where appropriate

Green Space and Biodiversity

Even small changes in temperatures and rainfall amounts can negatively impact biodiversity. Land at Oakes Farm will incorporate a landscape strategy that aims to:

Deliver a net gain in biodiversity, making use of climate tolerant native species to minimise the risk of climate change effects on site habitats and species, enhancing and protecting the site in the long term.

The masterplan will incorporate a series of green and blue infrastructure that can help mitigate the effects of high temperatures and overheating. These spaces will:

Help cool down the local area, clean the air, filter water and in general promote improved emotional wellbeing for local residents.

Water Provision & Flooding

Decreasing summer rainfall, could result in reduced mains water availability. There is a need therefore to reduce the water consumption of the development.

The Scheme will aim to set water efficiency targets for both residential and non-residential buildings.

Increasing winter rainfall could increase the risk of flooding:

- SuDS will be throughout the development.
- Drainage systems will be designed to include an appropriate allowance for climate change.

Connectivity

There are opportunities for the development to provide pedestrian, cycle and vehicular connections to B4101 Balsall Street to the north of the site along with access to the existing public rights of way network located to the east of the site. The B4101 Balsall Street allows for access into the village centre as well as access to the A452 connecting into Birmingham & Solihull to the North and Warwick and Leamington Spa to the south (via A4177). The A452 allows for connections to the M40, M42 and M6, that provide connection to other regions of the UK.

The internal site layout will provide for internal streets that are well connected and will encourage access by walking and cycling. The proposed development site is

well connected and in a sustainable location that is well positioned to integrate into the existing infrastructure. The site also boasts opportunity to form part of a wider context for the surrounding draft allocations in Balsall Common, which will further increase the level of connectivity around the village.



SUMMARY

This vision document demonstrates how land at Oakes Farm, Balsall Common has the potential for the delivery of much needed, new housing in a sustainable location closely located to facilities and services as well as sustainable transport modes.

The site sits within a suitable location with development located to the east and west, making the site an infill scheme with the opportunity to create a stronger settlement edge to Balsall Common.

The site is closely located to nearby bus services that gain access into the village centre as well as Birmingham and Coventry. The train station is located within a 20 minute walk and allows for access to wider regions of the UK.

There is opportunity to bring forward, as part of the development proposals, green space to give a positive benefit on the Green Belt Context. This will also generate ecological value, with the creation of a new green space area as part of the development proposals.

The site will include a surface water drainage strategy, that will mitigate against any risk of surface water flooding as well as allowing for an appropriate amount for climate change. These drainage features will be incorporated into the sites landscape and encourage biodiversity.

Benefits at a Glance

- **Logical and strategic extension to Balsall Common** - The site is adjacent to the existing urban edge of the village. This is currently suburban in character and does not reflect the rural characteristics of the Green Belt. The masterplan could provide a new softer urban edge to the settlement, responding positively to the rural character.
- **Sustainable and well connected location** - The site is situation close to sustainable transport modes including bus, train and plane. The existing PRowS open up opportunity for wider pedestrian movement will help to promote an active community, through well designed spaces
- **High Quality green amenity** - A sufficient amount of green space will be provided within the scheme. This will incorporate flood management, landscaping, ecology, play spaces and informal amenity spaces for the local community.
- **Responsive design** - The scheme will respond positively to the existing context character of Balsall Common, thorough context character assessment will be undertaken as part of a future design process.







Turley

SPITFIRE
bespoke homes



**Oakes Farm,
Balsall Common**

**Environmental
Appraisal**

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

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

December 2020
Report Reference
edp3777_r004a

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| Appendix EDP 4 | Draft Local Plan Proposals Map |

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| | |
|-------------------|---|
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| Plan EDP 2 | Landscape Character and Context (edp3777_d001b 14 December 2020 AL/WG) |

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Section 1

Introduction

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

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Section 2

Landscape

Introduction

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

The Site

- 2.4 The site boundary as defined on **Plan EDP 1** identifies the area of land that is currently within Spitfire Bespoke Homes Ltd control.
- 2.5 The site lies at the south western edge of the settlement of Balsall Common within Solihull Metropolitan District. Comprising five land parcels, the site lies adjacent to Balsall Street (B4101) and Fernhill Lane. The development area contains a mixture of land uses, predominantly open pasture broken by post and wire fences and a hedgerow on the eastern side of the site running north to south. There is a residential dwelling on the northern boundary towards the north-west corner of the site which is the only building within the boundary. The site is bisected by an access road leading to Oakes Farm Shop and associated Farmstead which form the site's southern boundary.
- 2.6 The site is bounded by two transport routes, residential and commercial dwellings and features strong vegetated boundaries. Balsall Street (B4101) contains the site to the north and Fernhill Lane to the west; Oakes Farm Shop and an additional residential dwelling help to enclose the southern boundary aided by hedgerows, and a strong linear hedgerow and treeline enclose the eastern boundary which is adjacent to a Public Right of Way (PRoW).
- 2.7 The character of the site is influenced by both settlement, transport routes and the land uses of the site itself.

Planning Background

- 2.8 Atkins Limited was commissioned by Solihull Metropolitan Borough Council (SMBC) to carry out a strategic review of the Green Belt in Solihull in preparation of the emerging local plan (Draft Local Plan Issued November 2016). The site was considered in the Solihull Strategic

Green Belt Assessment (July 2016) as part of the area RP60. **Figure EDP 2.1** indicates the approximate site location within RP60. It is clear that the site is considerably smaller than RP60, which warrants further assessment specifically of the site against the purposes of the Green Belt.

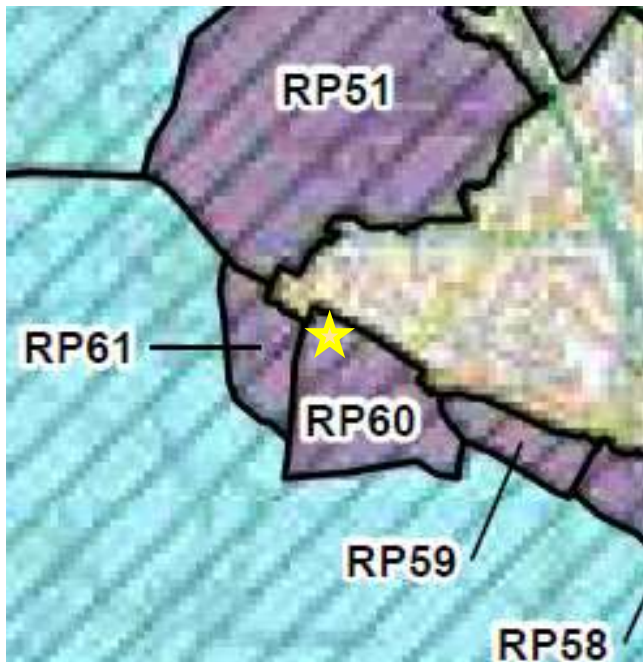


Figure EDP 2.1: Approximate location of site (yellow star) within Atkins parcel RP60.

- 2.9 The Atkins review assessed the extent to which land designated as Green Belt in Solihull performs against the purposes of Green Belt as set out in paragraph 134 of the National Planning Policy Framework (NPPF); and is intended to form the basis for a future, more detailed assessment. In relation to RP60 the document concludes that; the Green Belt is moderately performing in purposes 2 and 3 and therefore:

“...represents a gap of between 1 and 5 Kilometres between Urban Areas; and

... is generally characterised by countryside, is adjoined by countryside and/ or has limited development present.”

- 2.10 The purpose of this assessment, undertaken by a Chartered Landscape Architect, is to advance the current understanding of the performance in landscape and visual terms of the site against the five purposes of the Green Belt and provide a commentary on the suitability of the site for sustainable development in this regard.

Landscape Related Designations and Policy

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

- The site falls within the Solihull Metropolitan Green Belt;

- Preceptory at Temple Balsall Scheduled Monument is situated within 2km of the site to the west;
- The Site of Special Scientific Interest (SSSI) designated River Blythe features within 2km of the site;
- There are 4 Ancient Woodland Sites within the 3km search area of the site;
- There are four Grade II Listed buildings within the immediate context of the site; and
- Three Conservation Areas feature within the 3km search area including Berkswell, Barston and Temple Balsall.

National Designations

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

Green Belt

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

2.14 The NPPF paragraph 134 sets out five purposes of the Green Belt, which are listed below:

- *“To check the unrestricted sprawl of large built-up areas;*
- *To prevent neighbouring towns merging into one another;*
- *To assist in safeguarding the countryside from encroachment;*
- *To preserve the setting and special character of historic towns; and*
- *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

2.15 The NPPF sets out guidelines for local planning authorities (LPAs) in relation to Green Belts including: the desire to plan positively to enhance their beneficial use, looking for opportunities to provide access, outdoor sport, and recreation; and to retain and enhance landscapes, visual amenity, and biodiversity; or to improve damaged and derelict land.

2.16 Guidance in paragraphs 138 and 139 makes clear that, when reviewing Green Belt boundaries, LPAs should take account of the need to promote sustainable patterns of

development; they should consider the consequences for sustainable development of channelling development towards urban areas, towns, and villages within the Green Belt or towards locations outside the Green Belt boundary. This will be considered further in the Planning Statement accompanying the consultation response.

2.17 Also of relevance to this report is guidance in paragraph 139 with regard to defining boundaries, which states that local authorities should *inter alia*:

- Not include land that it is unnecessary to keep permanently open; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Interim Conclusions

2.18 The site does not fall within or contain a national landscape designation. However, the site does lie within the designated area of Green Belt. Collectively, the area surrounding the site contains a number of nationally and locally designated ecological and heritage assets. At the local level, PRow runs along the site's eastern boundary.

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

Local Policy

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

- POLICY P5 – Provision of Land for Housing;
- POLICY P10 – Natural Environment;
- POLICY P14 – Amenity;
- POLICY P15 – Securing Design Quality;
- POLICY P17 – Countryside and Green Belt;

- POLICY P18 – Health and Well Being; and
- POLICY P20 – Provision for Open Space, Children’s Play, Sport, Recreation and Leisure.

Policy Discussion

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

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

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

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

1. *“The Council will safeguard the “best and most versatile” agricultural land in the Borough unless there is an overriding need for development that outweighs the loss, and will seek to protect the character of the countryside.*
2. *Land designated as Green Belt in the Borough is identified on the Policies Map and will be kept permanently open, in accordance with national Green Belt policy.*
3. *Inappropriate development will not be permitted in the Solihull Green Belt, unless very special circumstances have been demonstrated in accordance with the NPPF.*

Paragraphs 145 and 146 of the NPPF set out forms of development that are not regarded as inappropriate. In interpreting these paragraphs the following provisions will apply:

- *Limited in-filling or redevelopment may take place in the following settlements without constituting an inappropriate development:*
 - *Chadwick End*
 - *Cheswick Green*
 - *Millison's Wood*
 - *Tidbury Green*
- *Limited infilling in villages shall be interpreted as the filling of a small gap within an otherwise built up frontage with not more than two dwellings.*
- *Disproportionate additions shall be interpreted as additions that are more than 40% of the original floorspace of the building.*
- *Where the re-use of buildings or land is proposed, the new use, and any associated use of land surrounding the building, should not conflict with, nor have a materially greater impact on, the openness of the Green Belt and the purposes of including land in it, and the form, bulk and general design of the buildings shall be in keeping with their surroundings."*

2.23 The Spatial Strategy (paragraph 58-70) of the Solihull Local Plan – Draft Submission Plan recognises that housing targets have not been met and the consent for the HS2 proposals in April 2020 has resulted in an increased in growth and in housing. The Solihull Local Plan – Draft Submission Plan makes it clear that developing Green Belt and expanding rural settlements is an option in accommodating growth. The Spatial Strategy identifies 7 options for development opportunities on Green Belt. The site falls within “*Growth Option F – Limited Expansion of Rural Villages/Settlements*” and sits within “*Land north, south and south east of Balsall Common.*”

2.24 A Solihull Local Plan Concept Masterplan (October 2020) has been published alongside the Solihull Local Plan – Draft Submission Plan to help set out the vision and spatial strategy for the Borough up until 2036. The plan identifies sites for potential development in 20 potential allocations to deliver the housing needs. The second site identifies an area south of Balsall Common (Policy BC2: Frog Lane, Balsall Common). The development is located east of the site and proposes 110 housing units.

2.25 It should be noted that neither the adopted nor the draft local plan proposals map define settlement boundaries. For the purposes of the assessment and discussion below this report has considered the Office for National Statistics ‘Built up Areas’ dataset and is presented on **Plan EDP 1**. Census data outputs for built-up areas (previously called urban

areas) have been produced from the 2011 Census. The methodology follows a 'bricks and mortar' approach, areas defined as built-up have a minimum area of 20 hectares (ha) and settlements within 200m of each other are linked. The coarseness of the data shown on **Plan EDP 1** is due to the methodology, which takes as its starting point a 50m grid to classify land cover information for each of the features within each cell.

Landscape Character and Visual Considerations

National Character

2.26 The site falls within Natural England's National Character Area (NCA) No 97 'Arden' which is briefly described as "*gently rolling with small fragmented semi-natural and ancient woodlands. Mature oaks set in hedgerows, distinctive field boundaries, historic parklands and narrow river corridors are key features, all on the doorstep of a heavily urbanised area*". The key characteristics of this NCA, of relevance to the site, are:

- *"Well-wooded farmland landscape with rolling landform;*
- *Diverse field patterns, ranging from well hedged, irregular fields and small woodlands that contrast with larger semi regular fields;*
- *The area is dominated by urban development and associated urban edge landscapes;*
- *Common oaks are still the dominant tree species and can be found both within towns and villages and as part of the hedgerow systems;*
- *The area is made up of a landscape of hedged, irregular fields and small woodlands. Narrow, often sunken lanes link scattered farms and there is a real sense of being closed in with restricted views; and*
- *The Knowle basin, is relatively low lying and separates the higher ground of the Warwickshire coalfield in the east and the eastern edge of the South Staffordshire (Black Country) coalfield to the west."*

Warwickshire Landscape Guidelines (November 1993)

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

- *"A gently rolling topography;*
- *A well-defined pattern of small fields and paddocks;*

- *Numerous mature hedgerow oaks;*
- *Permanent pasture often grazed by horses;*
- *A network of minor lanes often with ribbon development; and*
- *Many place names ending in Heath”.*

Solihull Borough Landscape Character Assessment

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

2.29 The site is entirely within LCA 4C (a sub category of LCA 4 – Rural Centre). The larger extent of LCA 4 is described as ‘the rural heartland of Solihull’. Important features of the area include historic settlements such as Temple Balsall and Berswell as well as the River Blythe SSSI.

2.30 The local area is predominantly agricultural divided between arable and pastoral land uses. Characterised by the presence of road networks and winding lanes, strong audible and visual impacts affect the tranquillity of the area. The LCA notes the ample network of footpaths that traverse the local area. The key characteristics of this area relevant to the site are:

- *“...an active rural agricultural landscape with arable and pastoral fields that support animal grazing;*
- *Area is generally rural with agriculture (mix of arable and pastoral) being the predominant use. Residential development is scattered across this area with a number of rural farm businesses...;*
- *Pockets of woodland including plantations are present across the area, which are generally found in close proximity to the settlements and river corridors. Larger areas of woodland are more noticeable to the east of the A452 and Frogmore Wood to the south is a prominent feature in the landscape;*
- *Lavender Hall Park is a Local Nature Reserve as well as a Principal Park located near Balsall Common.”*

Sensitivities and Pressures

2.31 The following sensitivities and pressures within the landscape of the ‘Rural Centre’ relevant to the site include:

- *“Pressure for development close to the edge of Balsall Common;*

- *Maintenance of public rights of way;*
- *Loss of biodiversity through intensive farming and land;*
- *Management;*
- *Overgrazing and trampling of land by horses which give the appearance of over use, degraded landscape and impacts upon biodiversity. Inappropriate fencing also impacts on rural character;*
- *Proximity of urban areas and their influence upon the River Blythe Corridor;*
- *Potential of farmstead sprawl with Neglect of field barns and vernacular buildings is impacting upon landscape character”.*

Sensitivity and Capacity

- 2.32 The assessment considers visual sensitivity of the area to be medium, due to the relative abundance of short and medium distance views. Generally, there is a strong relationship between the open countryside and the adjoining urban areas. Landscape value is considered as medium due to the presence of notable landscape features and a largely consistent, rural characteristic field pattern. Overall, the assessment considers that the landscape could accommodate areas of new development of an appropriate type, scale, form and vernacular. Furthermore, development should not result in the loss of the irreplaceable habitats.

EDP Site Character and Visual Assessment

- 2.33 The character of the site and its immediate surroundings are generally consistent with published assessments, outlined above, particularly in relation to the ‘pastoral fields that support animal grazing’ and ‘scattered rural farm businesses’. The published assessments also recognises the domination of urban development and associated urban edge landscapes. The site is relatively open with intervisibility across the site and the settlement to the north (**Photograph EDP 1**), views into the site from the properties to the north are within a sub-urban setting and therefore do not retain any sense of a rural character. The current view is characterised by the rising topography, the access road, farm shop and associated building along the site’s southern boundary which detract from any perception of open countryside (**Photograph EDP 2**).



Photograph EDP 1: Illustrating open interface with the current settlement edge, land use of for grazing and post and wire fencing. Taken from the approximate site centre facing northwards.



Photograph EDP 2: View of Oakes Farm complex illustrating the character of the site, rising landform and vertical visual elements. Taken from the northern portion of the Oakes Farm Access Road facing south and representative of views from the current settlement edge.

- 2.34 Hedgerows feature around the periphery and within the site, hedgerows are largely intact and well maintained where present (**Photograph EDP 3**), post and wire fencing however dominates field separation across the site. The farm shop and associated agricultural

buildings along the site's southern boundary give the site a settled, fringe character with the PRoW along the eastern boundary attaining a semi urban character.



Photograph EDP 3: Illustrating condition of hedgerows where presents across the site.
Taken from the approximate site centre facing northeast.

- 2.35 The current settlement edge and character of Balsall Street (B4101) to the north acts to differentiate the site from the wider agricultural landscape and exerts further urbanising influence on the sites character (**Photographs EDP 4 and 5**). The frequency of traffic, parking and associated street lighting, planting and furniture in combination with the house type, form and boundary treatments defines a clearly suburban character.



Photograph EDP 4: Illustrating the settled character marking the entrance to Balsall Common along Balsall Street (B4101) to the north-west of the site. Taken from the junction of Balsall Street and Barn Close facing south-east.



Photograph EDP 5: Illustrating the settled character marking the entrance to Balsall Common along Balsall Street (B4101) to the north-west of the site. Taken to the west of the junction of Balsall Street and Fernhill Lane facing south-east.

2.36 In visual terms, the site is well-contained by vegetation accommodating the sites boundary, limiting the immediate intervisibility to the east and west (**Photograph EDP 6**). Balsall Common settlement edge abuts both the north and west boundary enclosing the site

(Photograph EDP 1). Residential and commercial dwellings also feature on the southern boundary affording some degree of enclosure and limiting the immediate intervisibility to the south. The southern portion of the site does however reside on a local ridge, the topography falls away to the south of the Oakes Farm complex and while the existing development is discrete in the view, receptors to the south are sensitive to change **(Photograph EDP 7)**. A PRoW runs the length of the east boundary; this path is enclosed either side by treed hedgerows. This densely vegetated avenue forms a strong visual barrier limiting views in and out of the site to the east.



Photograph EDP 6: Illustrating strong vegetation along sites western boundary as well as properties along Fernhill Lane. Taken from the approximate site centre facing west.



Photograph EDP 7: Illustrating the visual context of the sites southern edge. Fernhill Farm and the buildings and structures associated with Oakes Farm Shop are clearly on the horizon. Taken from the junction of two footpaths adjacent to Fernhill Lane in the locality of Sedgemere, facing north toward the site

- 2.37 The site's environmental planning constraints, landscape context and character have been identified by EDP following a site visit and data trawl and are presented on **Plans EDP 1** and **2**. The findings are broadly consistent with the above published character assessments and the further discussion below.
- 2.38 While the site may be regarded as 'open countryside' for planning purposes, its current and surrounding land use (**Photograph EDP 8**) and visual character is such that it does not form part of the more functionally intact agricultural landscape to the south.



Photograph EDP 8: Illustrating currently intensive commercial land use and scattered structures. Taken from the approximate site centre facing southward.

- 2.39 It should be noted that it is not necessary to hide new development in this landscape context; built development (including housing) is already an established and frequent component of the visual character of the area, so new development will not be inappropriate, unexpected or discordant as part of the views.
- 2.40 In summary, in visual terms, whilst the site is relatively open it is perceived as an enclave within the current settlement due to topography, vegetation, the current land use and the surrounding residential development. Overall, there is limited cohesion between the site and the surrounding landscape and a far greater attachment between the site and the current settlement edge.

Green Belt Assessment

- 2.41 The approach is to undertake the assessment in two stages. First, to assess the site against the Atkins methodology. This will allow for a direct comparison to be made with the much larger RP60. Secondly, to assess the site against the EDP methodology outlined further below. This asks more questions of the site in order to develop a further detailed understanding of the contribution the site makes to the five purposes. Additionally, a comparative assessment is undertaken of the nearest site, also using the EDP methodology.
- 2.42 The scoring between the EDP and Atkins methodology is not comparative; the Atkins methodology asks four questions against four of the five purposes resulting in a maximum score of 12 if each purpose was to be strongly met. No contribution is given a score of '0'. The EDP methodology asks eight questions against all five purposes but no contribution is given a score of '1', resulting in a maximum score of 21 if each purpose was to be strongly

met. The Atkins methodology does not score sites against their inclusion within the Green Belt, the reasoning being that all land within their review is within the Green Belt. However, for completeness, the EDP methodology does score sites for their inclusion within the Green Belt. The Green Belt Assessment has been undertaken by a Chartered Landscape Architect.

Assessment Criteria

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

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

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

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

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

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 2.48 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain man-made features such as historic landmarks or isolated properties, or even larger areas of settlement.
- 2.49 This assessment is based on the key landscape characteristics of the site and its surroundings as well as the visual context as described above.
- 2.50 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative 'value' element to be applied to landscapes.
- 2.51 The matter of 'encroachment' is also a judgement that considers whether or not built form (such as residential development and/or related urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or affects it and also the degree to which it has preserved the key characteristics or severed them from the wider countryside. A site which has limited or no urbanising influences has a stronger role in safeguarding countryside.
- 2.52 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, it is large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- 2.53 However, natural features in particular including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded.

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

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

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

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

Assessment Against Atkins Methodology

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

Table EDP 2.1: EDP Assessment using Atkins Methodology.

| Refined Parcel | Description | Purpose Scores | | | | | Total | Highest Score |
|---------------------|--|----------------|---|---|---|----------|---------------------|---------------|
| | | 1 | 2 | 3 | 4 | | | |
| RP60 | Land between Firnhill Lane and Frog Lane | 1 | 2 | 2 | 0 | 5 | 2 (Purpose 2 and 3) | |
| EDP Assessment Site | Land at Oakes Farm, Balsall Common | 1 | 0 | 1 | 0 | 2 | 1 (Purpose 1 and 3) | |

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 2.57 Development would not bring the settlement edge of Balsall Common any close to either Kenilworth to the south-east or any of the smaller settlements to the south and west.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 2.58 As demonstrated by **Plan EDP 2**, the site is well associated with the existing settlement edge and is contained by residential or commercial development on all sides. In this context, the site does not have a strong sense of countryside in which to encroach.

Interim Summary

- 2.59 The site is considerably smaller than the Council's RP60 parcel resulting in a significant reduction in the performance of the site against Purpose 2. At this smaller spatial scale, in which 'countryside' is sub-urbanised, the potential for encroachment is also reduced, as evidenced by the lower score against Purpose 3.

Assessment Against EDP Methodology

- 2.60 The following section presents the EDP Green Belt Assessment using a more detailed suite of questions and a slightly different scoring system. An assessment has also been undertaken of the next nearest site, this being to the east, bounded by Frog Lane to the

south, Holly Lane to the east and to the north, by existing residential development off Balsall Street East.

Methodology

- 2.61 EDP have developed a methodology for Green Belt Assessment, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.
- 2.62 The site is scored against the criteria listed for each purpose as shown in **Appendix EDP 1**, with criteria scoring set out in **Table EDP 2.2**.

Table EDP 2.2: Scoring.

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

- 2.63 The grading of overall scores reflect the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt, or retained within it.
- 2.64 The findings are presented in the Green Belt Assessment Table in **Appendix EDP 2** and the findings of the assessment for the Frog Lane parcel is contained in **Appendix EDP 3**.
- 2.65 This assessment does not include consideration of the potential of the site to address all NPPF paragraphs relating to the Green Belt. This is, however, provided as part of the planning statement supporting the information submitted to the LPA.
- 2.66 The findings demonstrate that, out of a maximum score of 21 (which would indicate that a site would be performing a strong role in achieving all Green Belt purposes) and a minimum score of 7, the site scores 10, which can be described as making a limited contribution.

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

- 2.67 This assessment considers how the site and its features contribute towards the openness of the Green Belt and the potential to create a permanent boundary, should it be taken out of the designation. The site comprises a variety of land uses including housing, grazing, post and wire fencing and hedgerows. The site is contained by built form on all sides. The sense of openness is, therefore, already limited to some extent. Further development of the site would contribute towards increasing the built form and therefore reduce the sense of openness experienced in views across the site where available. However, that sense of openness has already been eroded.

- 2.68 The area is delineated by clearly definable boundaries that follow Balsall Street to the north, strong vegetation and a footpath with residential and commercial development beyond to the east, the current edge of built form and buildings associated with Oakes Farm including the farm shop business to the south, and Fernhill Lane (with associated properties) along the western boundary. Should development be delivered in a considered manner, a defensible boundary would be created along the southern site boundary.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- 2.69 It is not considered that this land parcel has any function in preventing coalescence. Development would not for example bring the settlement edge of Balsall Common any closer to either Kenilworth to the south-east or any of the smaller settlements to the south and west. It is therefore considered that development of the site will not contribute to 'unrestricted sprawl' or 'the merging of neighbouring towns'.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 2.70 The site is abutted (and contains) existing residential and commercial development to all aspects. It is contained to the north by Balsall Street, to the east by a right of way, to the south by Oakes Farm (and topography) and to the west by Fernhill Lane. The site is well associated with the existing settlement edge and is contained by development on all sides.

- 2.71 In landscape character terms, the site currently has a strong urban fringe character being overlooked by residential properties to the north and surrounded by residential development on three sides and a farm shop on the fourth. It also contains one large modern residential property with no vernacular references as well as a tarmacked road which provides access to the farm shop business. Advertising signage associated with the farm shop business also contributes to the urban fringe character of the site. Balsall Street to the north has a distinctive suburban character. Although the road follows a historic route, post war 'residential estate' properties predominate which lack local vernacular features nor offer a 'sense of place'. Thus, the site does not have a strong sense of countryside in which to encroach. Furthermore, the site has limited connectivity with the wider open countryside due to the development of the farm shop business, which restricts the potential for any further encroachment. The site therefore has a far greater affinity to the settlement of Balsall Common.

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

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

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

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

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

Summary of Findings for Frog Lane

2.75 A summary of the assessment of the Frog Lane site and a comparison with the Oakes Farm assessment is presented in **Table EDP 2.3**.

Table EDP 2.3: Green Belt Assessment using EDP Methodology

| EDP Assessment | Description | Purpose Scores | | | | | Total |
|----------------------------|---|----------------|---|---|---|---|-----------|
| | | 1 | 2 | 3 | 4 | 5 | |
| Frog Lane | Next nearest site at Frog Lane and Holly Lane | 3 | 3 | 4 | 1 | 2 | 13 |
| Oakes Farm, Balsall Common | Land at Oakes Farm, Balsall Common | 2 | 2 | 3 | 1 | 2 | 10 |

2.76 The findings demonstrate that the Frog Lane site performs a stronger purpose against three of the tests compared to the Oakes Farm site. With regard to those performances, it was considered that development of the site is likely to have a particular effect on the rural character and setting of Frog Lane to the south and east.

Conclusions

2.77 This briefing paper has provided an overview of the landscape and visual aspects of the site, which lies within the Green Belt, and provided landscape evidence of the suitability of the site for sustainable development in this regard. The conclusions in respect of these matters is summarised below.

2.78 The site contains no designated environmental assets. There is no intervisibility with any Conservation Area. There is the potential for filtered, glimpsed views from the south. Development will be visible from residential receptors along Balsall Street. Consideration should also be given to the Balsall Street approach to Balsall Common, although the character is already influenced by the existing development. Further consideration should be given to the southern boundary treatment to prevent visual encroachment to the open countryside to the south. These receptors will need careful consideration in the masterplan process to ensure a sensitive approach. With appropriate strategies in place development at the site could comply with all relevant policy and guidance at local and national level.

2.79 This preliminary landscape and visual appraisal finds that the character of the site is more heavily influenced by the settlement edge than the surrounding countryside.

2.80 The landscape and visual based assessment of how the site and its features contribute towards the purposes of the Green Belt is summarised below:

- Purpose 1 – the site currently contains one residential property and a farm shop access road, which compromises its openness to some degree. The site has clear defensible boundaries on all sides;
- Purpose 2 – development of the site would not bring the settlement of Balsall Common closer to Kenilworth or any of the smaller settlements to the south or west;
- Purpose 3 – in landscape character terms, the site currently has a strong suburban and is influenced by the current settlement edge on three sides as well as the farm shop business to the south which is accessed via a tarmacked route through the site. As discussed above, considered masterplanning along the southern boundary would safeguard any encroachment into the countryside;
- Purpose 4 – there is no proximity or intervisibility with the historic core of a town and thus the area does not perform against this function; and
- Purpose 5 – The site is entirely contained within the Green Belt and does therefore perform positively against this function. However, as demonstrated above, with the identified need for some development within the Green Belt, some development can occur in this location while preventing merging of settlements, encroachment and unrestricted sprawl.

2.81 A comparison assessment of the land at Frog Lane found that this contributes a stronger performance against three of the Green Belt purposes and the development of it would have particular effect on the rural character and setting of Frog Lane to the south and east.

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

Updates in the Draft Local Plan

2.83 The draft Solihull Local Plan – Draft Submission Plan and the Solihull Local Plan Concept Masterplan identifies the adjacent Frog Lane site for potential development and proposes 110 housing units:

- With regards to the site's character and visual context, development at Frog Lane would introduce urban characteristics to the eastern site boundary; and
- With regards to purpose 1 and 3 of the Green Belt Assessment, a development at Frog Lane would bring urban characteristics in close proximity to the site which would be appreciable in the local context.

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

Section 3 Ecology

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

Preliminary Ecological Baseline

Designated Sites

- 3.2 Statutory designations represent the most significant ecological receptors, being of recognised importance at an international and/or national level. Statutory designations of International/European value include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. Statutory designations of national value include SSSIs and National Nature Reserves (NNRs). Local Nature Reserves (LNRs) are also statutory, with their level of value typically considered at county level or less.
- 3.3 The site itself is not covered by any statutory designations, however, three SSSIs and one LNR occur within the site's potential ZoI¹, detailed in **Table EDP 3.1** below.

Table EDP 3.1: Statutory Sites of Nature Conservation Importance within the Site's Potential ZoI.

| Site Name | Size (ha) | Approx. Distance from Site | Interest Feature(s) |
|-----------------|-----------|----------------------------|--|
| SSSIs | | | |
| River Blythe | 39km | 1.5km NW | River with a wide range of natural structural features and substrate types. The structure is very variable and its importance is increased because of the rarity of such examples in lowland Britain. The diverse physical features of the Blythe are mirrored by its diverse plant communities. The mean number of plant species found in any 1km stretch is above average for a lowland river, as is the number of species recorded for the whole length of the river. |
| Berkswell Marsh | 8.0 | 2.9km N | An area of fen meadow bisected by a tributary of the River Blythe and two blocks of wet woodland. Forms the largest-known example of fen meadow in the West Midlands county. |

¹ Zone of Influence - the areas and resources that may be affected by the proposed development. International designation = 15km, national designation = 5km and local designations = 2km

| Site Name | Size (ha) | Approx. Distance from Site | Interest Feature(s) |
|--------------------|-----------|----------------------------|---|
| SSSIs | | | |
| Tilehill Wood | 29.5 | 4.9km NE | One of the largest areas of semi-natural woodland remaining in the county. Fluctuating water-levels due to impeded drainage have influenced the overlying vegetation. This has resulted in small acidic pools and mires which add interest. |
| LNR | | | |
| Lavender Hall Park | 10.9 | 1.1km NE | LNR and green flag park. |

- 3.4 There is no direct terrestrial or hydrological connectivity between these designated sites and the site. In addition, the site does not fall into an Impact Risk Zone² for which residential developments are required to consult with Natural England as to their impacts on any SSSIs. Whilst there may be an increase in recreational impact on the LNR as a result of development at the site, it is well managed for visitors and recreation is encouraged. As such any increase in recreational pressure arising from the proposed development of the site is unlikely to result in any significant harm to this LNR.
- 3.5 No information has been obtained on non-statutory designations at this stage, however, mapping within the Solihull Nature Conservation Strategy (2010 – 2014) shows there are five Local Wildlife Sites within the potential Zol.

Habitats

- 3.6 Using aerial imagery, the site appears to consist of several grazed field parcels bounded by defunct hedgerows with trees. There is a building present within the northern field parcel.

Protected and Notable Species

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

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

Birds

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

Bats

- 3.9 The hedgerows within the site and to a lesser extend the pasture fields are likely to provide foraging and commuting habitat for bats. The area of woodland and the brook to the south of the site are also likely to provide a commuting route and foraging habitat for bats within the wider landscape.
- 3.10 The mature trees within the site and on the boundaries and the building within the northern field parcel may also potentially support roosting bats. There are a number of European Protected Species (EPS) licences in the area of roosts of common pipistrelle (*Pipistrellus pipistrellus*) and brown long eared bat (*Plecotus auritus*).

Amphibians

- 3.11 An overview of Ordnance Survey (OS) mapping shows that there is one potential pond to the west of the site. This pond is approximately 200m from the site but is not separated from the site by anything that would be a significant barrier to dispersal of amphibian species such as great crested newt (*Tritus cristatus*) and common toad (*Bufo bufo*). Great crested newts, and their breeding/resting places, are fully protected under UK and EU law. In addition, both of these species are local biodiversity action plan (LBAP) species³ and the habitats on site are likely to provide suitable terrestrial habitat for them. There are a number of EPS licences in the area for great crested newt.

Reptiles

- 3.12 There is some potential for the grassland and tall ruderal vegetation within the site to support reptiles and grass snake (*Natrix natrix*), slow worm (*Anguis fragilis*) and common lizard (*Zootoca vivipara*) which are all LBAP species³.

Badgers and Other Notable Mammals

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

³ Solihull Metropolitan Borough Council, Solihull Nature Conservation Strategy 2010 - 2014

Key Constraints and Opportunities

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

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

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Section 4 Heritage

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

Designated Heritage Assets

- 4.2 The site does not include any designated heritage assets, as defined in Annex 2 of the NPPF, where there would be a presumption in favour of their retention/preservation *in situ*.

- 4.3 The closest such assets are four Grade II listed buildings, which are located within its vicinity and comprise:

- Wisteria Cottage (List ID: 1343240), a one storey plus attic 17th century timber framed house with brick nogging and a machine tiled roof, located c.10m to the west;
- Shenstone Grange (List ID: 1391724), located c.10m to the north. This is a 17th century rendered timber framed house with a 19th century range and extensive Edwardian extensions in brick with applied timber framing. The listing citation emphasises the relatively intact survival of the original 17th century house, which may have been a farmhouse originally. Given the affect of the rendering, it is also noted in the listing citation that the 'timber framed house is much more evident from the interior'. Particular features are noted, such as the sandstone fireplace and surviving curved windbraces;
- Hobbe Cottage (List ID: 1075980) a one storey plus attics timber framed house with thatched roof and door hood, located c.10m to the north; and
- Barn at Balsall Street Farm (List ID: 1075979), a 17th century timber framed barn with brick nogging and thatched roof, located c.20m to the east.

- 4.4 These listed buildings predominantly draw their significance from their architectural and historic interest, as early post-medieval houses (albeit with later alterations in many cases) and a barn in the local vernacular, demonstrating building techniques and styles relevant to their period.

- 4.5 With regard to Shenstone Grange, there is also some artistic interest from its architectural embellishments. By comparison, Wisteria Cottage and Hobbe Cottage are both of fairly simplistic form, with little decorative pretension, and therefore have limited artistic interest. The barn is a functional structure, with no obvious decorative elements, and is considered to have no artistic interest. Apart from Shenstone Grange, which has undergone notable modification in the modern period and may therefore contain currently hidden earlier fabric, none of these listed buildings are considered to have any archaeological interest.

- 4.6 Wisteria Cottage is located within private gardens, which are currently in the process of being partly built over for a 1 ½ storey extension, located to the south of the cottage. The extent of these gardens broadly reflect the layout shown on historic cartographic sources from the 19th century. The cottage is orientated north, facing toward Balsall Street from where it is accessed. Today, the listed building is on the eastern end of a row of modern houses that are aligned along this road. A narrow lane is located immediately to the east of the cottage, beyond which is the western edge of the site. This site boundary is well-hedged and there is very limited experience of the cottage from the site, and vice versa.
- 4.7 Given these considerations, the garden plot and Balsall Street are considered to make positive contributions to the listed building's significance, due to historic and functional connections. The site is a peripheral element of the setting and is not considered to make more than a negligible contribution. This contribution is localised and restricted to the north-west corner, where it forms part of a 'green backdrop' to this listed building. There is otherwise no known historic or functional links between the site and the cottage. There is no reason to believe that the development of the site could lead to more than a negligible change to the setting of this asset, which could be further minimised through sensitive masterplanning. Such a change is unlikely to have more than a negligible, if any, affect on the significance of the listed building.
- 4.8 In terms of Hobbe Cottage, this is also contained within private grounds that broadly reflect those shown on earlier maps. There are some indications from the Hampton in Arden Tithe Map of 1841 that it was the residence of a cartwright, with an associated workshop located immediately to the east. This workshop has since been demolished and the listed building today is enveloped to the east, north and west by modern residential development.
- 4.9 The site lies a short distance to the south and is separated by Balsall Street and a sub-road. Other than forming part of a 'green backdrop' to the listed building to the north, there are no known historic or functional links with the site. Therefore, it is considered that the cottage draws no more than a very limited amount of significance from the site, expressed in views into part of the north-east corner on the opposite side of the roads. Any changes to this aspect of the setting can be minimised through careful masterplanning and there is no reason to believe that any levels of effect to the significance of the cottage (if any were to result from the development of the site) would be of such magnitude as to be unacceptable in the context of the public benefits of delivering development.
- 4.10 With regard to Shenstone Grange, 19th century cartographic sources suggest that it once formed part of a small farm complex, with associated buildings to the west and north, and functional connections with fields to the north, east and west (outside of the site). These elements have since been removed and/or built over and, as noted in the listing citation, the earlier range has been extended into a large Edwardian house. Indeed, these later built elements dominate the earlier fabric, and present the dominant aspect of the building in the streetscene. The listed building is contained within private gardens and along a row of modern houses, set back from a sub-road that deviates off Balsall Street. Therefore, whilst the earlier range was most likely a farmhouse originally, today there is nothing in the experience of the building to suggest this history and the former connections with farmland

that has since been developed. Instead it is appreciated as part of a large residential house on the edge of Balsall Common.

- 4.11 The site is separated from this listed building by the intervening roads and there is limited visual connections, and with the earlier range notably largely hidden by the later extension. Whilst the site forms farmland and the earliest elements of the listed building were at one point used as a farmhouse, there are no known historic or functional links with the land within the site and any former farming function is no longer appreciable due to later alterations. As such, the listed building is considered to only draw a limited amount of significance from the site. Any loss of this limited contribution through the development of the site could be further minimised by sensitive masterplanning and there is currently no reason to believe that any resultant effect (if there is any) would be of such a magnitude as to be unacceptable in terms of a planning application.
- 4.12 The barn was historically contained within a farmyard, some elements of which survive today, albeit the farming function has since ceased and instead the complex is used as offices. Modern additions to this complex broadly reflect the historic farm style and are considered sympathetic to its development. These elements in its setting are considered to positively contribute to its significance. Similar to those listed buildings discussed above, the barn is otherwise experienced in a populated modern residential setting. The site is separated from the barn, both physically and visually, by modern development and intervening vegetation. Given the lack of any known historic or functional links, it is not considered to form part of its setting and the development of the site is unlikely to result in harm to the barn's significance.
- 4.13 Designated heritage assets beyond this immediate group are visually and physically separated from the site by the intervening topography, and built and vegetated environment. There are also no known historic or functional connections between the site and these assets either. As such, there is no reason to believe that the development of the site for a proportionate development would result in any change to their setting or harm to their significance.

Non-designated Heritage Assets

- 4.14 A review of online sources for archaeological information, such as the Archaeological Data Service and the results of desk-based assessments for nearby planning applications, has not identified any previously known buried remains within the site.
- 4.15 Historic cartographic sources were consulted to inform this statement. The earliest reviewed map was the Hampton in Arden Tithe Map of 1841, which shows the site as divided into four arable and pasture fields, with two tenements and gardens contained within a small plot on the northern edge. With regard the latter, a pair of semi-detached Victorian cottages are shown in this part of the site, which were demolished in c.1950. However, this former building footprint is in the approximate location of the modern bungalow contained within the site and it is likely that any associated remains have been

heavily truncated or removed by this modern development and its associated landscaping and services.

- 4.16 Otherwise, the OS Maps from 1887 to 1988 show a continuation of the agricultural use of the large majority of the site into the present, albeit it has gradually been amalgamated into two larger fields with a modern roadway running through the centre.
- 4.17 Whilst it is recognised that in due course a full archaeological assessment will be required to support any future planning application, based on the current evidence there is no indication that the site would contain significant archaeological remains.

Section 5 Conclusion

- 5.1 Spitfire Bespoke Homes Ltd appointed EDP to undertake landscape, ecology and heritage studies in relation to Oakes Farm, Balsall Common.
- 5.2 This document considers the context of the site in relation to landscape, ecological and heritage matters.

Landscape

- 5.3 A comparison assessment of the land at Frog Lane found that this contributes a stronger performance against three of the Green Belt purposes and the development of it would have particular effect on the rural character and setting of Frog Lane to the south and east.
- 5.4 Thus, it is considered that the Oakes Farm site could reasonably be removed from the Green Belt and developed in accordance with the sound masterplanning principles without harm to the integrity of the Green Belt overall. Particularly in context of the proposed adjoining development.

Ecology

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

Heritage

- 5.7 The development of the site would have to carefully consider the treatment of the settings of the Grade II listed Wisteria Cottage, Shenstone Grange and Hobbe Cottage, in terms of the negligible, very limited or limited amount of significance they currently draw from parts of the site. However, there is no reason to believe that the effect on these listed buildings would be of such magnitude as to be unacceptable in terms of a planning application, in the wider context of the public benefits of the quantity and type of development promoted. In addition sensitive masterplanning would further reduce any potential affects still further, such as in the provision of landscaping and green spaces, and by offsetting built form and controlling massing and height. Indeed, in some instances this may avoid any noticeable affects altogether.
- 5.8 Based on current evidence, it also appears unlikely that the site contains archaeological remains of such significance and extent as to form a constraint to development.
- 5.9 Therefore, in terms of heritage, there is no current reason to believe that the site would be constrained to the point where its deliverability or capacity were compromised.

Appendix EDP 1

Assessment Methodology and Criteria

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

| NPPF Paragraph 134 Green Belt Purpose | Criteria | Application of Criteria to Site and Criteria Score |
|---|--|---|
| | <p>Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography: a larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap.</p> <p>The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging.</p> | <p>Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?</p> <ol style="list-style-type: none"> Immediate and clear intervisibility with next nearest settlement edge (score: 3); Partial visual association with next nearest settlement edges (score: 2); and Limited or no visual association with next nearest settlement edges (score: 1). |
| <p>Purpose 3 To assist in safeguarding the countryside from encroachment</p> | <p>The countryside comprises 'key characteristics' which define the landscape and the way it is perceived, both visually and physically.</p> | <p>To what extent does the site represent the key characteristics of the countryside?</p> <ol style="list-style-type: none"> The site is strongly representative of the key characteristics and clearly connects with off-site key characteristics. (score: 3); The site comprises some representative key characteristics but there are few connections with off-site characteristics (score: 2); and The site comprises little or no key characteristics and there is limited or no connection with off-site characteristics (score: 1). |
| | <p>Encroachment: features such as speed signage and street lighting affect the extent to which the countryside changes from rural to urban.</p> | <p>To what extent is the site urbanised, either by on-site or off-site features?</p> <ol style="list-style-type: none"> There are no urbanising features within the site or directly influencing it (score: 3); There are several urbanising features affecting the site (score: 2); and There are many urbanising features affecting the site, which reduces its representativeness of the countryside (score: 1). |

| NPPF Paragraph 134 Green Belt Purpose | Criteria | Application of Criteria to Site and Criteria Score |
|---|---|--|
| Purpose 4 To preserve the setting and special character of historic towns | In the absence of professional judgement on setting and special character on a site-by-site basis by heritage consultants, the criteria considers the proximity of the site to the historic core of a town. | What is the spatial and visual relationship between the site and the historic core of the nearest towns? a. The site shares a boundary with the historic core of the town, is partially or wholly within it or has clear intervisibility with the historic core (score: 2);and b. The site does not share a boundary with the town and/or there is no intervisibility with its historic core (score: 1). |
| Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land | By association with the Green Belt designation, would assist in urban regeneration by directing development away from it. | a. The site is in the Green Belt (score: 2); and b. The site is not in the Green Belt (score: 1) |

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Appendix EDP 2

Green Belt Analysis: Oakes Farm

| NPPF Paragraph 134 Green Belt Test | Application of Criteria | Assessment | Criteria Score |
|---|--|--|-------------------|
| Purpose 1: To check the unrestricted sprawl of large built-up areas | Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/wider countryside? | The site contains a mixture of land uses including a residential property, tarmacked and fenced farm shop access road and pasture. There is little perceptual and physical connectivity to the wider countryside to the south. | 1 |
| | Are there any defensible boundaries? | The site boundary follows strong defensible features such as roads, hedge lines and existing built form. It is likely that short sections of boundary reinforcement could be carried out to assimilate the development within its setting. Sensitive treatment of the southern edge would be necessary to prevent visual encroachment to the open countryside. | 1 |
| Purpose 2: To prevent neighbouring towns merging into one another | Is the site well-associated with the existing settlement edge? | The site is inset within the southern settlement edge of Balsall Common with which it has a distinct interaction. It is greatly divorced from the wider open countryside to the south. | 1 |
| | What is the intervisibility with the next nearest settlement edge? | The site is not visible from any significant settlements in the surrounding area. Its southern edge may be glimpsed from small hamlets to the south. | 1 |
| Purpose 3: To assist in safeguarding the countryside from encroachment | How representative is the site of the key characteristics of the countryside? | The site currently has a strong suburban character due to the current commercial access use. It is also subject to urban influences from the settlement edge on three sides, particularly Balsall Street to the north. There has been some deterioration of landscape fabric and complete removal of hedgerows due to intensive agricultural activity and a lack management. | 2 |

| NPPF Paragraph 134 Green Belt Test | Application of Criteria | Assessment | Criteria Score |
|---|---|--|---------------------------|
| | What is the influence of urbanising features? | The influence of urbanising features can be seen across the site. The current land use and associated temporary structures detract from any perception of rural countryside character. The settlement edge and character of Balsall Street along the northern boundary has a strong urbanising effect with the visual, perceptual and sensory influence of, traffic, signage, lighting and noise. The site's current land use with commercial units along the southern boundary, associated access road and parking is audible and visually legible. As it stands the site is already physically and visually separated from the wider open countryside to the south and has a far greater affiliation to the settlement edge. | 1 |
| <u>Purpose 4:</u> To preserve the setting and special character of historic towns | What is the nature of the spatial and visual relationship between the site and the historic core of the nearest town? | There is no proximity or intervisibility with the historic core of a town and thus the area does not perform against this function. | 1 |
| <u>Purpose 5:</u> To assist in urban regeneration, by encouraging the recycling of derelict and other urban land | Is the land within the Green Belt? | The site is entirely within the Green Belt. | 2 |
| | | | 10 |

Appendix EDP 3 Green Belt Analysis: Frog Lane

- A3.1 The site is located to the south of Balsall Common. The land consists of agricultural land, horse pasture, a recreation ground, a residential property and allotments. The site is contained by a strong hedgerow and roadside vegetation along Frog and Holly Lane, **Image EDP A3.1**. Internally there is a network of hedgerows and trees. In spite of the mixed land use and urban fringe influence the site retains an agricultural character. Much of its sensitivity is derived from the rural character of the lanes which encircle the site.



Image EDP A3.1: Strong hedgerow and roadside vegetation along Frog and Holly Lane; view from layby on Frog Lane looking west.

- A3.2 Development of the site is likely to have a particular effect on the rural character and setting of Frog Lane to the south and east. Furthermore, increased traffic on the local road network would also affect the landscape character beyond the immediate site to the south extending the settlement edge. The current settlement edge is defined by the properties along Balsall Street, which back onto the site. There is a clear distinction in character between the frontages and rear gardens of these properties where the associated landscaping has a softening effect and creates a sense of permanence to the current settlement boundary.
- A3.3 Currently, the well vegetated field boundaries and rural character of Frog Lane, serves to create a strong sense of rural character, with a very effective, rapid transition from suburban to countryside. The residential properties along Balsall Street which back onto

the site, are 'estate built' and have a very distinct suburban character to their frontage which contrasts with the individual dwellings and farm buildings along Holly and Frog Lane.

- A3.4 It is also of note that the well-vegetated boundaries of the site precludes any views of the settlement edge of Balsall Common from the countryside to the south/south-west. This would likely change should the site be developed creating a further sense of encroachment beyond the area of potential development.
- A3.5 The site contains the Grade II listed Cottage Farm and is overlooked by two further Grade II listed buildings to the west at Frogmore Grange.

Green Belt Assessment

| NPPF Paragraph 134 Green Belt Test | Application of Criteria | Assessment | Criteria Score |
|---|--|---|-----------------------|
| <u>Purpose 1: To check the unrestricted sprawl of large built-up areas</u> | Does the site form a contiguous open buffer between the existing settlement edge and the other settlement areas/wider countryside? | The site contains a mixture of land uses including the Grade II listed Cottage Farm, allotments and a recreation ground. | 2 |
| | Are there any defensible boundaries? | The site is encircled by lanes and strong vegetation which is considered defensible but of note that in this instance, development would likely harm the rural character and extend the visual footprint of the settlement to the south setting a precedent for future development to the east. | 1 |
| <u>Purpose 2: To prevent neighbouring towns merging into one another</u> | Is the site well-associated with the existing settlement edge? | The site buffers the settlement edge to the north but retains a rural character across much of its area, including Holly and Frog Lane. | 2 |
| | What is the intervisibility with the next nearest settlement edge? | The site is relatively contained and there is little potential for intervisibility with other settlements. | 1 |
| <u>Purpose 3: To assist in safeguarding the</u> | How representative is the site of the key | The strong tree cover and hedgerow boundaries have a dominant influence on the site | 2 |

| NPPF Paragraph 134 Green Belt Test | Application of Criteria | Assessment | Criteria Score |
|--|--|---|---------------------------|
| countryside from encroachment | characteristics of the countryside? | and create a sense of place that is more closely related to the character of the wider countryside than the suburban character of Balsall Common, despite the influence of urban edge land uses such as the recreation ground, paddocks and allotments. | |
| | What is the influence of urbanising features? | The influence of urbanising features can be seen in the settlement edge to the north, the recreation ground and the allotments. | 2 |
| Purpose 4: To preserve the setting and special character of historic towns | What is the nature of the spatial and visual relationship between the site and the historic core of the nearest town? | There is no proximity or intervisibility with the historic core of a town and thus the site does not perform against this function. | 1 |
| Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land | Is the land within the Green Belt? | The site is entirely within the Green Belt. | 2 |
| | | | 13 |

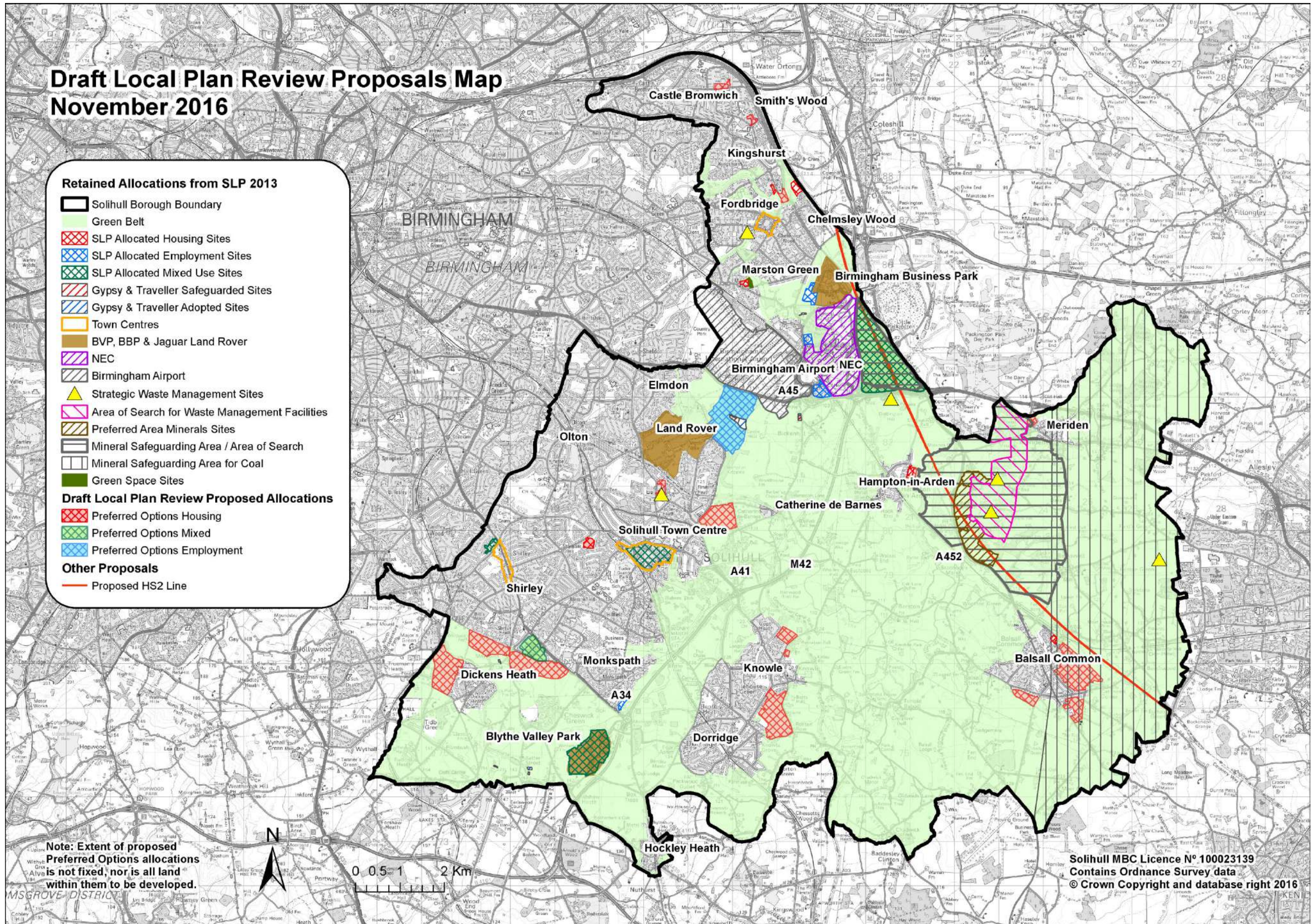
A3.6 The above assessment concludes that the site makes a moderate contribution towards Green Belt function. Development of the site has the potential to set a precedent for development to the east, which would further extend the settlement into open countryside to the south.

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Appendix EDP 4
Draft Local Plan Proposals Map

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D. Proposals Map

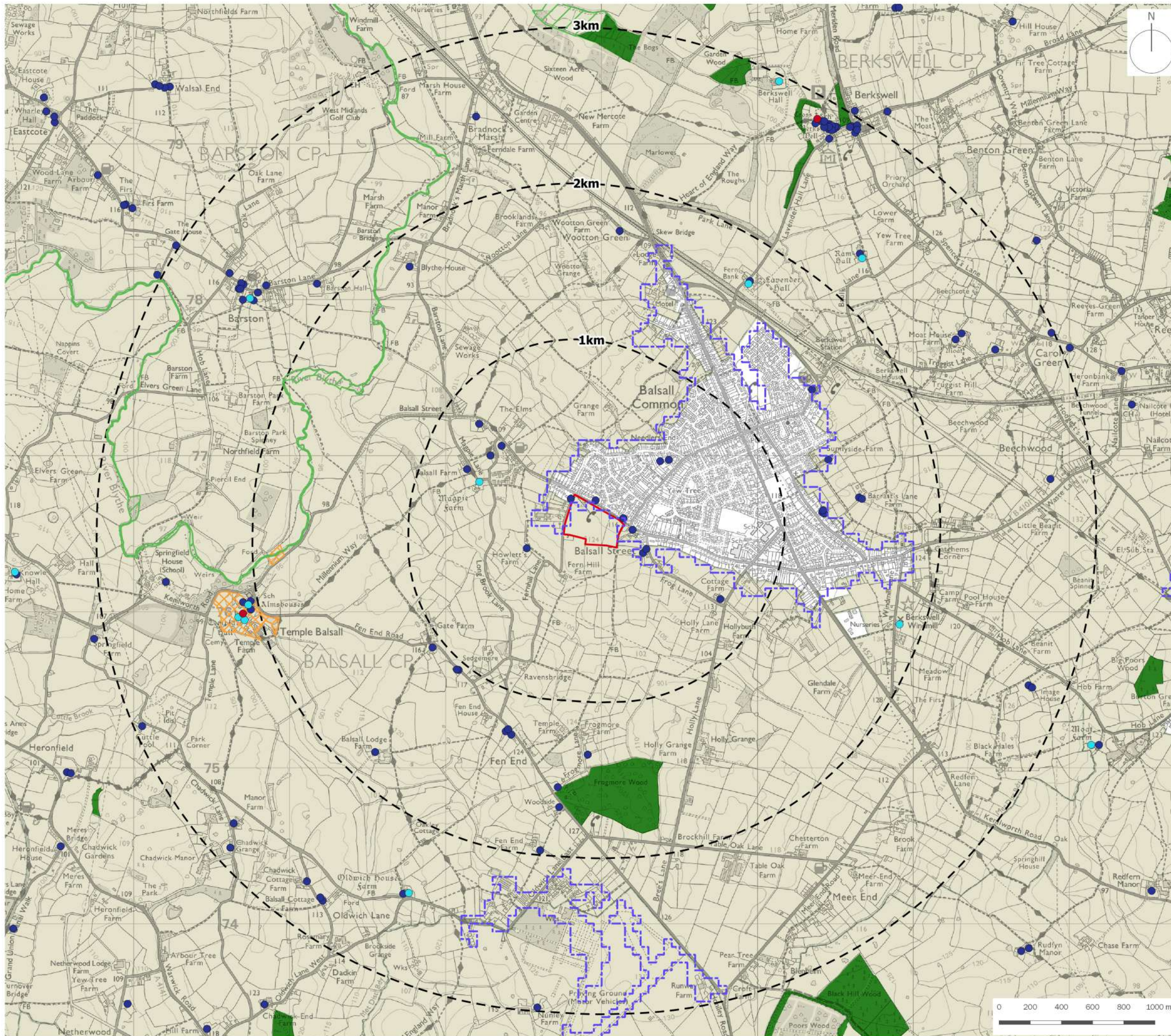


Plans

Plan EDP 1 Environmental Planning Context
(edp3777_d002b 14 December 2020 AL/WG)

Plan EDP 2 Landscape Character and Context
(edp3777_d001b 14 December 2020 AL/WG)

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



client
Spitfire Bespoke Homes Ltd

project title
Oakes Farm, Balsall Common

drawing title
Plan EDP 1: Environmental Planning Context

| | | | |
|----------------|--------------------|----------|-----|
| date | 14 DECEMBER 2020 | drawn by | AL |
| drawing number | edp3777 d002b | checked | WG |
| scale | Refer to scale bar | QA | JTF |

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- Site Boundary
- ^ ^ ^ Linear Tree Belt
- ● ● Public Right of Way
- ← Key Views

client
Spitfire Bespoke Homes Ltd

project title
Oakes Farm, Balsall Common

drawing title
Plan EDP 2: Landscape Character and Context

date 14 DECEMBER 2020 drawn by AL
drawing number edp3777_d001b checked WG
scale Refer to scale bar QA JTF



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SOLIHULL BOROUGH HOUSING NEED REPORT

Prepared on behalf of:

Barratt David Wilson Homes

Spitfire Bespoke Homes

IM Land

Heyford Developments

Generator Strategic Land

December 2020

SOLIHULL BOROUGH HOUSING NEED REPORT

December 2020

| | |
|-----------------------|-------------------|
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1.0 INTRODUCTION

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

2.0 NATIONAL PLANNING POLICY CONTEXT

i) Introduction

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

ii) National Planning Policy Framework (NPPF, 2019)

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

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

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

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

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

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

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

iv) Status of the Standard Method (December 2020)

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

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

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

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

v) Summary

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

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

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

3.0 LOCAL PLANNING POLICY

i) Introduction

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

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

ii) Adopted Solihull District Plan (03 December 2013)

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

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

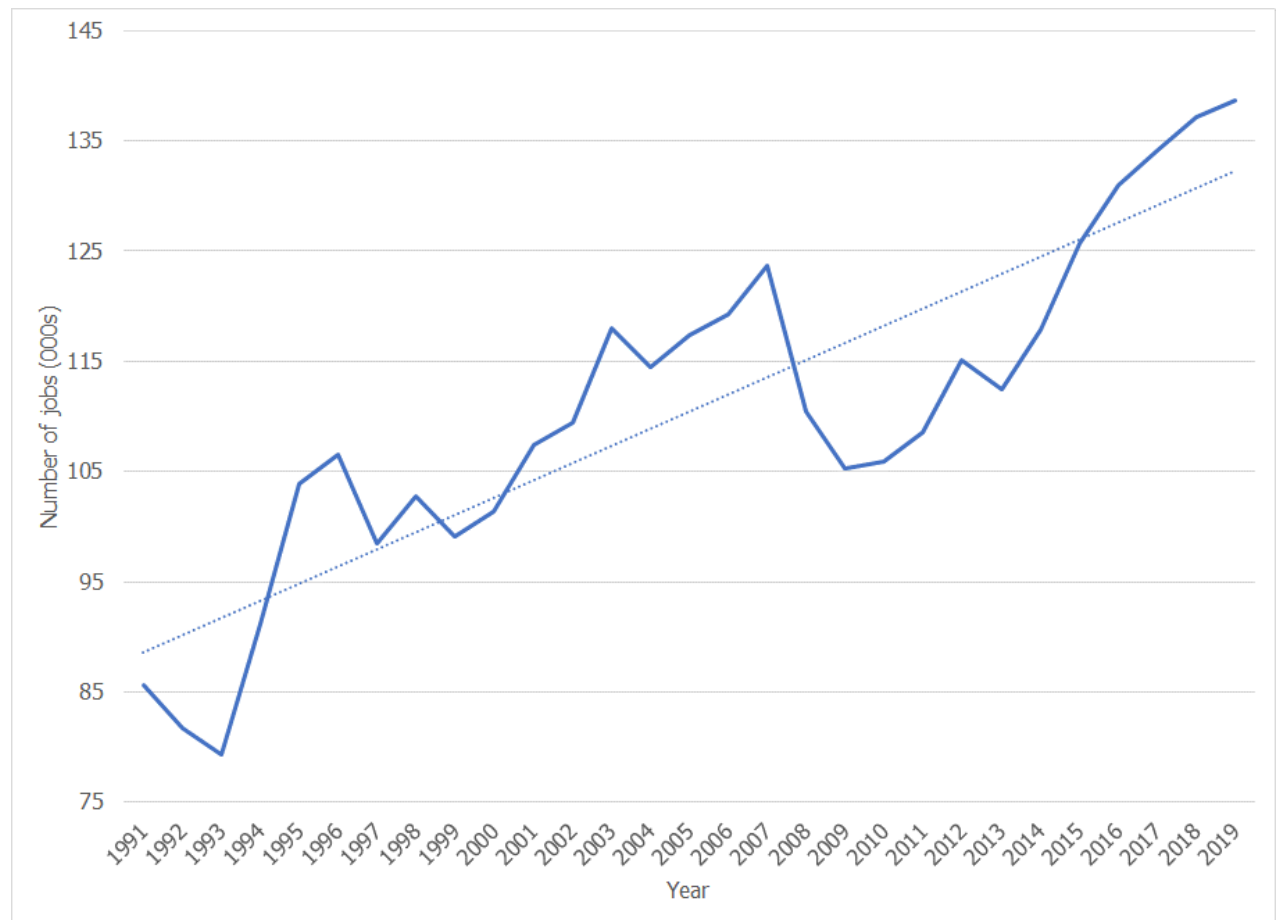
¹2011 Census commuting ratio (0.98) continuing from 2020-2036;

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 intercensal 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.