

Solihull Local Plan Representations to Draft Submission Plan Consultation

Land at Stratford Road, Hockley Heath

St Philips Land

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1.0 Introduction

Purpose

- 1.1 These representations have been prepared by Lichfields on behalf of St Philips They have been prepared in response to the consultation on the ‘Solihull Local Plan – Draft Submission Plan’ (‘DSP’).
- 1.2 These representations focus on the elements of the DSP relating to housing and residential site allocations and are written in the context of St Philips’ land interests at Stratford Road, Hockley Heath, which is being actively promoted for residential development.
- 1.3 A Vision Document has been prepared which sets out the site proposals comprising a logical extension to Hockley Heath for approximately 37 units. This is enclosed at **Appendix 1**.
- 1.4 We have provided further background on the site below as this provides important context to our representations on the DSP.
- 1.5 It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is “sound”, as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies contained within the National Planning Policy Framework (‘NPPF’) and advice contained within the Planning Practice Guidance (‘PPG’).
- 1.6 There is no statutory definition of “soundness”. However, the Framework states that to be sound a Local Plan should be:
- **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;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.
- 1.7 In addition, NPPF paragraph 11 states that:
- “Plans and decisions should apply a presumption in favour of sustainable development.*
- For plan-making this means that:*
- a *Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
 - b *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, unless:*
 - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

- ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

1.8 These representations demonstrates that the policy approach within the DSP require amendments in the context of the tests of soundness established by the Framework.

1.9 **Structure of Representations**

1.10 Representations to the following Local Plan chapters and policies are provided in this report:

- 1 Providing Homes for All
 - a Policy P5 – Provision of Land for Housing
- 2 Hockley Heath
 - a Policy HH1 – Land South of School Road, Hockley Heath
- 3 UK Central Hub
 - a Policy UK1 – HS2 Interchange

1.11 **Background to Land at Stratford Road, Hockley Heath**

1.12 **Site Context**

1.13 The wider site comprises approximately 46ha of land to the north east of Hockley Heath, bordered by Stratford Road to the west, Box Trees to the north and Aylesbury Road to the south.

1.14 The land within SMBC’s domain totals approximately 1.7ha. Applying a density of 22dph, the site could deliver approximately 37 units. The remainder of the site falls within Warwick District Council and will be promoted through a subsequent review of the Warwick Local Plan and which would deliver a combined total of circa 317 dwellings.

1.15 Overall, the proposals will allow the initial release of land for around 37 dwellings within Solihull on land lying immediately to the east of Aylesbury Road and would allow a small urban extension to the settlement. This would be followed by the cross-boundary promotion of land for a comprehensive sustainable urban extension of the remainder of the site, which lies within Warwick District.

1.16 St Philips has prepared a Vision Document enclosed at **Appendix 1**. The Vision Document has been informed by detailed technical studies and evidence, ultimately demonstrating that the site is deliverable and that there would be no undue constraints to development.

1.17 These representations are made on the basis that the land at Aylesbury Road represents a logical and justifiable opportunity for development, taking into account the known constraints and evidence base, when compared to alternative allocations for residential development considered through the Draft Local Plan.

1.18 **Site Promotion**

1.19 These representations build on a previous submission made on behalf of St Philips to the Draft Local Plan Supplementary Consultation, March 2019.

1.20 St Philips is a local site promoter with a track record of promoting sites for residential development and, as such, the site is considered to be deliverable in the short term.

2.0

Providing Homes for All

Policy P5 – Provision of Land for Housing

2.1

St Philips objects to a number of components within the overall policy approach taken through Policy P5 and considers that the policy, as currently drafted, is flawed on the following accounts:

- 1 **Housing requirement:** as proposed, the housing requirement proposed at P5(1) does not allow for any flexibility to respond to changing circumstances.
- 2 **Housing trajectory:** the Policy refers to a trajectory at P5(2), but fails to set out a detailed, site-specific housing trajectory, outlining the anticipated delivery rates of all the strategic allocations.
- 3 **Housing supply:**
 - a **Windfall sites** – the allowance for windfall development at paragraph 222 is considered too ambitious, and insufficient evidence has been presented at paragraph 223 and elsewhere to justify that the assumed assumption represents a reliable source of housing supply.
 - b **Town Centre sites** – the delivery of these sites has not been set out and it is therefore unclear as to when the Council anticipate development on these sites will come forward.
 - c **Allocation UK1 (HS2 Interchange)** – as set out in our response to Policy UK1, it is considered that the Council's anticipated delivery of 2,740 units within the plan period is unrealistic, and should therefore be decreased.

Housing Requirement

2.2

The DSP identifies a housing requirement of 15,017 for the plan period 2020-2036 as replicated below.

Table 2.1 Solihull Housing Requirement

Component	Figure (total)	Figure (annualised)	Source
Local housing need	12,912	807	Para 220
Uplift to accommodate economic growth (144)	13,056	816	Para 221
Uplift to accommodate shortfall from GBHMA (2,105)	15,017	938	Para 228

Source: Draft Submission Plan

2.3

The Council is only proposing to deliver 15,017 dwellings (i.e. existing commitments and new allocations) which would meet the minimum requirement for housing including delivery of a small element of cross boundary growth. Additionally, a stepped delivery trajectory is proposed, which would result the delay in delivery of homes to meet needs in the early part of the plan period. As a result the DSP would fail to be “*sufficiently flexible to adapt to rapid change*” (Para 11) as required by the NPPF.

2.4

In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land or allow sufficient headroom so that there is an appropriate buffer within the overall planned supply.

2.5

At present, the Council's proposed growth strategy would only just meet the proposed 15,017-dwelling housing requirement. It does not allow for any flexibility to respond to changing

circumstances. If any single component of supply does not come forward or if, for example, the strategic allocations (representing 35% of the land supply) or UK Central Hub (representing 18% of the land supply) fall behind the timescales implied by the Council, the housing figure is unlikely to be fulfilled and the housing needs will not be met.

- 2.6 Additionally, it is understood the Council intends to contribute 2,105 dwellings to meet unmet housing from the Greater Birmingham and Black Country Housing Market Area; however, this is not set out in a Statement of Common Ground (SoCG). Equally, the derivation of the committed contribution is undefined as the DSP only confirms that the contribution equates to the difference between identified supply and the LHN (paragraph 228).
- 2.7 In the absence of SoCG, St Philips considers that an increase to the proposed housing requirement is necessary to ensure additional flexibility in the event that constituent HMA authorities suggest a need for an increased contribution to the shortfall.
- 2.8 Moreover, the Government has also confirmed its intention to review the standard methodology. The Government's consultation on Changes to the Current Planning System (ended 1st October 2020) included proposed revisions to the standard method for assessing housing numbers in strategic plans. The revised methodology increases the minimum LHN for Solihull to 1,011 dwellings per annum, which is above the Council's proposed housing requirement of 938 dwellings per annum.
- 2.9 Although the Council has confirmed its intentions to submit the DSP for Independent Examination prior to the transitional arrangements, any delay to the plan-making or submission process means the Council will need to have regard to the revised standard method figure. It would therefore be prudent for the Council to build in a buffer at this stage and seek to begin considering a number of additional sites that could deliver sufficient capacity to meet this increased figure.
- 2.10 As such, it is necessary for the Council to identify additional suitable land supply (i.e. more than needed to meet the housing requirement) to ensure that there is the flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period.
- 2.11 In essence, it is strongly recommended that greater flexibility be built into the Local Plan Review. To this end, St Philips recommends that a circa 5-10% headroom should be included in the housing requirement set out under Policy P5(1). In doing so, the Council will need to identify sites to facilitate the delivery of between **circa 750–1,500 dwellings**.

Housing Trajectory

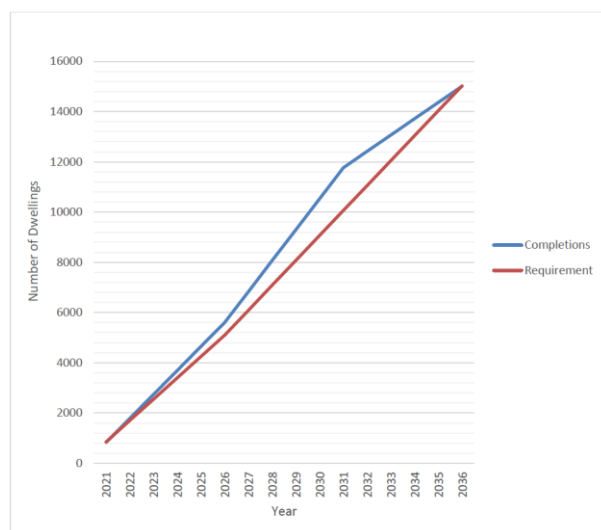
- 2.12 The Council confirms its intention to propose a stepped requirement against three 'Delivery Phases', as replicated at the table and graph below.

Table 2.2 Housing delivery phases and stepped housing requirement

Delivery Phase	Stepped Requirement	Annualised Requirement
I – 2020-2026	5,106	851
II and III – 2026-2036	9,911	991
Total	15,017	938

Source: DSP paragraph 224

Figure 2.1 Housing trajectory



Source: DSP paragraph 224

- 2.13 In the absence of a trajectory elsewhere in the Council's evidence base (including the Meeting Housing Needs Topic Paper and Infrastructure Delivery Plan), the Plan fails to clearly set out how the anticipated rate of development for specific sites would deliver the housing target over the plan period.
- 2.14 The approach proposed through the table and graph at paragraph 224 clearly does not accord with NPPF paragraph 73 which requires:
- "Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites."*
- 2.15 Given that the Council has not included any buffer to its land supply in meeting housing needs, it is critical that the anticipated annualised rate of delivery for the proposed strategic allocations is set out. Such an approach in including a trajectory is highly advised by the Planning Advisory Service ('PAS') in its Good Plan Making Guide:
- "The local plan should contain a housing trajectory or provide a Housing Implementation Strategy in the evidence base (sometimes this is combined with an Infrastructure Delivery Strategy. This is used to demonstrate housing delivery against housing need. Some authorities are seeking to "backload" their housing trajectories citing the poor housing market as a reason for doing so. However, the point about the trajectory is that it should relate to housing need. There is little point in planning to provide additional housing in the latter part of the plan period if the need is for housing in the early plan period. Thus to be effective housing policies need to be closely related to where and when the housing need is anticipated." (Paragraph 6.13)*
- 2.16 The Council's proposed growth strategy for the Plan is largely predicated on the delivery of UK Central Hub via draft Policy P1; this is anticipated to facilitate the delivery of 2,740 units in the plan period up to 2036¹ (representing 18% of the proposed land supply) using Policy UK1, The Hub Framework Plan, and the Arden Cross Masterplan as policy vehicles.
- 2.17 The Council correctly concedes that *"these proposals are site specific as they are dependent on the delivery of HS2"* (para 843). Crucially, the Council anticipates *"that HS2 will be operational*

¹ DSP Paragraph 89

from 2029-33” and therefore “subject to the delivery of HS2 the proposals are likely to come forward towards the end of the plan period” (para 845).

- 2.18 In the absence of a detailed site-specific trajectory, the Council has failed to demonstrate that housing delivery will be able to meet housing need, not only in the early plan period (as advised by PAS) but indeed in the plan period as a whole.
- 2.19 As further set out in our response to Policy UK1, the Council’s assumptions on the timing and delivery of HS2 suggest the housing allocations at UK Central Hub will deliver circa 390 dpa if build-out commences by 2029, or circa 910 dpa if build-out commences from 2033. Clearly, these represent a wholly unrealistic delivery rate which further justifies the need for the Council to present a more detailed, site-specific housing trajectory.
- 2.20 In considering the likely lead-in times and delivery rates of large strategic settlements, Lichfield’s *Start to Finish* research has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; the emerging Mendip Local Plan; and the emerging Doncaster Local Plan).
- 2.21 *Start to Finish* (Second Edition) identifies that the average timescale of validation of an outline application to completion of the first dwelling for sites of over 2,000 dwellings is **8.4 years**².
- 2.22 Notwithstanding that an outline planning application on land at UK Central Hub has yet to be submitted, the research also finds that the average build-out rate for sites of over 2,000 dwellings is **160 dpa**³.
- 2.23 Consequently, even if an outline planning application for the proposals at UK Central Hub were to be submitted to align with the Examination in Public, the build-out rates implied by the Council, as above, are wholly unrealistic. The assumed delivery by the Council of 2,740 dwellings by 2036 should therefore be decreased to a more realistic rate equating to 160 dpa from 2029, or 1,120 dwellings.
- 2.24 In order for Policy P5 to meet the tests of soundness, St Philips requests that the Council includes a detailed, site-specific housing trajectory, setting out the anticipated delivery rates of all the strategic allocations proposed pursuant to Policy P5(1).

Housing Supply

Windfall Sites

- 2.25 As set in the table at DSP paragraph 222, and further outlined at paragraph 223, the Plan anticipates the delivery of 2,800 dwellings through windfall sites between 2022-2036, equating to an annualised rate of 200 dpa.
- 2.26 Principally, St Philips considers this allowance too ambitious, and that insufficient evidence has been presented to justify that 200 dpa is likely to comprise a reliable source of housing supply. Accordingly, NPPF paragraph 70 sets out the need to consider an allowance for windfall sites within housing land supply:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

² Lichfields *Start to Finish* (Second Edition) Figure 4

³ Lichfields *Start to Finish* (Second Edition) Figure 7

- 2.27 Paragraph 61-63 of the ‘Meeting Housing Needs Topic Paper’ sets out the Council’s purported justification for including such a level of windfall allowance. In this regard, the Council contends:

“The windfall assumption in the adopted Solihull Local Plan was 150 dpa. The average windfall supply since 1992 has increased to 208 dpa and in the last decade is 251 dpa. The 5YLS position adopted at Cabinet in July 2019 set out a revised windfall rate of 200 dpa to reflect his position.” (Paragraph 63)

- 2.28 Whilst these reported figures appear to present a reliable trend of housing delivered through windfall sites, it would be unreasonable and inappropriate to conclude that 200 dpa has *continuously* been delivered. Putting aside average completions, Appendix H of the Five Year Land Supply (July 2020) sets out the number of annual net completions from the preceding five years:

Table 2.3 Net housing completions from windfall sites 2015-2020

Year	Net windfalls
2015/16	190
2016/17	200
2017/18	158
2018/19	295
2019/20	389

Source: Appendix H, Five Year Land Supply at 1st April 2020 (July 2020)

- 2.29 As can be seen, only 190 and 158 net completions were achieved during 2015/16 and 2017/18 respectively. As is required by NPPF paragraph 70, this trend clearly does not represent “compelling evidence” demonstrating 200 dpa will provide a reliable source of housing supply, particularly as the Council is choosing not to include flexibility within its housing requirement. Resultingly, if delivery from windfall sites were to fall below 200 dpa in any one year during the plan period, the housing requirement is unlikely to be fulfilled and the housing needs will not be met.
- 2.30 Moreover, whilst the most recent 5YLS positions (both July 2019 and July 2020) assume a 200 dpa windfall allowance, this proposed approach was refuted by the Inspector at appeal APP/Q4625/W/19/3237026 decided February 2020:
- “The Council contend that any shortfall would be made up for by allocations coming forward in the DSP and/or windfall development, citing a past trend of windfall permissions, which I accept accounts for a high level of pipeline supply in the short term. However, aside from this proposal, I heard that there were no other developments proposed not already accounted for in the pipeline supply. Therefore, despite past windfall supply and the healthy pipeline supply, there is little evidence that there would be additional windfall supply going forward.”* (Paragraph 39) [Emphasis added]
- 2.31 Indeed, NPPF paragraph 70 requires that any allowance must have regard to “historic windfall delivery rates and expected future trends” and thus whilst the Council may be able to present a healthy past supply, compelling evidence has not been presented to sufficiently demonstrate a healthy supply going forward.
- 2.32 In order for Policy P5 to meet the tests of soundness, St Philips strongly recommends that the windfall allowance is decreased from 200 dpa to 150 dpa, as already assumed in the extant Local Plan. At 150 dpa, a resultant capacity of 2,100 dwellings from 2022-2036 would warrant the Council to identify sites to facilitate the delivery of a further **700 dwellings**.

Town Centre Sites

- 2.33 As set out in the table at DSP paragraph 222, the Plan anticipates the delivery of 961 dwellings through ‘Town Centre Sites’; Footnote 29 adds that this source comprises ‘Solihull Town Centre (861) & Chelmsley Wood Town Centre (100)’.
- 2.34 The Solihull Town Centre sites are allocated under Site 8 of the extant Local Plan (2013) and the Draft Local Plan Supplementary consultation (March 2019) proposed its retention under sites which had not yet commenced but are to be retained as allocations (para 435).
- 2.35 No site-specific allocations are proposed through the DSP in order to deliver the Solihull Town Centre sites, however paragraphs 126-128 (which support Policy P2) confirm that the Illustrative Town Centre Masterplan (2016) indicates 1,500 new homes could be delivered in Solihull Town Centre, with 861 of these expected to be delivered in the plan period.
- 2.36 Whilst the Council’s ambitions to adopt the Masterplan as a Supplementary Planning Document following Local Plan adoption⁴ are noted, St Philips questions the specific timing of development coming forward early in the Plan period. Given that such sites have benefitted from housing allocations in the extant Local Plan, the adoption of the Illustrative Town Centre Masterplan SPD will not in itself result in delivery in the early plan period where housing need is most critical.
- 2.37 Crucially, this further substantiates the need for the Council to undertake detailed, site-specific housing trajectory, setting out the anticipated delivery rates of the Town Centre Sites pursuant to Policy P5(1).

Tests of Soundness

- 2.38 St Philips considers that the policy approach taken with Policy P5 would not meet the tests of soundness because:
- 1 **It is not positively prepared:** The proposed growth strategy and identified housing supply would only just meet the proposed 15,017-dwelling housing requirement and does not allow for any flexibility to respond to changing circumstances. The Council has failed to set out a detailed housing trajectory and, thus, if any single component of supply does not come forward or if the strategic allocations fall behind the timescales implied by the Council, the housing requirement is unlikely to be fulfilled and the housing needs will not be met.
 - 2 **It is not justified:** In the absence of a detailed site-specific housing trajectory, the policy approach incorporates unevidenced assumptions on the delivery rates of strategic allocations, including that at UK Central Hub which is anticipated to facilitate the delivery of 2,740 units in the plan period up to 2036, representing 18% of the proposed land supply. Additionally, the Plan’s assumptions on the proposed windfall allowance are not sufficiently justified.
 - 3 **It is not effective:** The DSP does not allow for any flexibility within the housing requirement to respond to changing circumstances through the plan period. In this regard, it fails to demonstrate the anticipated delivery rates of the larger strategic sites over the plan period.
 - 4 **It is not consistent with national policy:** It does not contribute to the achievement of sustainable development, including the social objective in the NPPF to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

⁴ Full Cabinet Committee, 5th November 2020, *Solihull Town Centre Masterplan*, Paragraph 3.27

Recommended Changes

- 2.39 In order to ensure that the Policy approach taken is sound, it is considered that:
- 1 A 5-10% headroom should be included in the housing requirement set out under Policy P5(1). In doing so, the Council will need to identify and sites to facilitate the delivery of circa 700–1,500 dwellings.
 - 2 A detailed, site-specific housing trajectory is prepared, setting out the anticipated delivery rates of the larger strategic allocations and Town Centre Sites proposed pursuant to Policy P5(1). The anticipated delivery rates for large sites including UK Central Hub should be realistically set to reflect the lead in time for the delivery of projects of this scale.
 - 3 The windfall allowance is decreased from 200 dpa to 150 dpa. At 150 dpa, a resultant capacity of 2,100 dwellings from 2022-2036 would warrant the Council to identify sites to facilitate the delivery of a further 700 dwellings.
- 2.40 The land off Stratford Road offers the potential to deliver a logical extension to Hockley Heath providing up to 37 dwellings.
- 2.41 Given the flaws earlier identified in the Council’s proposed land supply, St Philips would strongly support an approach to allocate this land following the Examination in Public. This approach would be entirely consistent with guidance set out in The Planning Inspectorate’s ‘*Procedure Guide for Local Plan Examinations*’:
- “It may therefore be necessary, after the hearing sessions have concluded, for the Inspector to write to the LPA asking them to undertake further work on the evidence base or to identify additional sites for allocation.”* (paragraph 5.21)
- 2.42 Additionally, St Philips would support and consider it entirely appropriate for the land to be included as an allocation through the Main Modifications process, as also set out in the ‘*Procedure Guide for Local Plan Examinations*’:
- “Any change to the submitted plan that would materially affect one or more of the plan’s policies can only be made as a MM recommended by the Inspector. MMs may be suggested by the LPA, by representors and hearing participants, or by the Inspector. They can range in scope from redrafting parts of an individual policy or of the reasoned justification, to the deletion of whole policies or site allocations and the insertion of new ones.”* (paragraph 6.2)
- [Emphasis added]

3.0 Hockley Heath

- 3.1 Principally, St Philips considers that given the resulting shortfall arising from the Council's land supply, the land off Stratford Road, Hockley Heath, should be allocated alongside draft Allocation HH1 on the basis of its strong scoring in the site selection process.
- 3.2 The table below compares the land off Stratford Road, assessed as Site Reference 503, with draft Allocation HH1, assessed as Site Reference 139:

Table 3.1 Site Selection scoring: comparison of Site 503 with draft Allocation HH1

Site Name	Land off Stratford Road	Land south of School Road
Site Reference	503	139
Accessibility Study Overall Score	Low/Medium	Medium/High
Green Belt Assessment Combined Score	6	5
Site Selection Step 1	9	6
Site Selection Step 2	R	G

Source: Solihull Local Plan Review: Site Assessments (October 2020)

- 3.3 Firstly, St Philips considers that the scoring of land off Stratford Road with 9 at the Site Selection Step 1 is incorrect on the grounds that whilst its accessibility scores *Low/Medium*, its low-performance in the Green Belt Assessment warrants its scoring as a 6 at the very least, which is categorised as follows:

Table 3.2 Step 1 Site Hierarchy Criteria – Priority 6

Priority	Category	Additional Description	RAG
6	Greenfield in accessible moderately performing Green Belt location	Green Belt non PDL in accessible location. Moderately performing Green Belt will generally have a combined score of 6 or 7 in the GBA	B

Source: Draft Local Plan: Site Selection Topic Paper

- 3.4 Following the site's re-scoring, its priority within the RAG scoring at Step 1 would equate to *Blue* or an 'unlikely allocation'. However, the site selection at Step 2 takes into account other considerations (e.g. site constraints and the spatial strategy) to give a finer grain analysis to the submitted sites. The methodology confirms that higher performing sites in the hierarchy need more significant harmful impacts if they are to be excluded, and for sites not performing well in the hierarchy they will need more significant justification to be included.
- 3.5 The land within Solihull Borough would form a logical extension to the settlement of Hockley Heath. The site is modest in size and is bound by permanent physical features in all directions which would ensure development of the wider site remains contained and has negligible impact on the remaining Green Belt.
- 3.6 There is existing development to the south of the site in the form of residential properties that form ribbon development along Aylesbury Road and Stratford Road. The proposed development will not extend beyond the limits of this current development, and will provide visual buffer planting along the northern site edge to create a defensible boundary.
- 3.7 Furthermore, Hockley Heath is not considered to be a large built-up area in the context of the original designation of the West Midlands Metropolitan Green Belt.
- 3.8 The nearest neighbouring settlement to the site and Hockley Heath is Dorridge to the north east. Although the development would extend Hockley Heath in this direction, the permanent

physical features bounding the site, as previously described, would not cause the gap between Dorridge and Hockley Heath to be adversely compromised. We therefore consider that development of the wider site would not cause neighbouring towns to merge into one another.

- 3.9 The development of the wider site would be a natural extension to the existing built-up area of Hockley Heath and is contained by permanent physical features, which have already been highlighted. These features would prevent encroachment into the wider countryside. Additionally, the extent of countryside already surrounding the wider site is considered to be robust, and which would not be adversely affected by the development of the wider site. The development of the site would not, therefore, contravene the Green Belt purpose of safeguarding the countryside from encroachment or creating urban sprawl.
- 3.10 The Vision Document submitted through the Call for Sites process and supporting this representation has examined in full the spatial relationship of the land at Aylesbury Road and the contribution made to the five purposes of Green Belt. It is demonstrated that the release of the site from the Green Belt in Solihull would be logical and would not result in overall harm to the purposes of Green Belt.

Tests of Soundness

- 3.11 St Philips considers that the policy approach taken in directing growth to Hockley Heath would not meet the tests of soundness because:
- 1 **It is not justified:** Given the site selection scoring of land at Stratford Road against the evidence base, and in comparison against draft Allocation HH1, its release from Green Belt is appropriate and would be based upon a justified position. Given the resulting shortfall arising from the Council's land supply earlier identified, there is an acute need for the Council to identify additional sites for housing. The land at Stratford Road represents a credible location to direct additional housing at Hockley Heath.
- 3.12 In order to ensure that the Policy approach taken is sound, it is considered that:
- The land at Stratford Road should be included as an allocation, alongside draft Allocation HH1, which offers the potential to deliver up to 37 dwellings as a logical extension to Hockley Heath.

4.0 UK Central Hub

Policy UK1 – HS2 Interchange

- 4.1 As set out in our response to draft Policy P5, the DSP fails to set out a detailed, site-specific housing trajectory outlining the anticipated delivery rates of all the strategic allocations. In failing to demonstrate the rate at which strategic allocations such as UK Central Hub will deliver, an unrealistic and ambitious figure of housing supply within the plan period has been assumed.
- 4.2 In the case of Policy UK1, the Council's proposed growth strategy for the Plan is largely predicated on the delivery of UK Central Hub; this is anticipated to facilitate the delivery of 2,740 units in the plan period up to 2036⁵ (representing 18% of the proposed land supply).
- 4.3 For clarity, it should be noted that whilst an anticipated housing supply of 2,740 dwellings within the plan period is referenced at paragraph 89 and 222, Policy UK1 does not itself explicitly state the dwelling capacity allowed for by the allocation.
- 4.4 The Council correctly concedes that *"these proposals are site specific as they are dependent on the delivery of HS2"* (para 843). Crucially, the Council anticipates *"that HS2 will be operational from 2029-33"* and therefore *"subject to the delivery of HS2 the proposals are likely to come forward towards the end of the plan period"* (para 845).
- 4.5 Notably, neither the Hub Framework Plan nor the Arden Cross Masterplan provide an up-to-date trajectory for the delivery of housing within the allocation for within the plan period.
- 4.6 In the absence of a detailed site-specific trajectory, the Council's assumptions on the timing and delivery of HS2 suggest the housing allocations at UK Central Hub will deliver on the following basis up to the end of the plan period by 2036:

Table 4.1 UK Central Hub likely build-out rate

Date HS2 operational / housing commencement	Years remaining to end of plan period (2036)	Annual build-out rate (2,740 total)
2029	7	391
2030	6	457
2031	5	548
2032	4	685
2033	3	913

Source: Lichfields analysis

- 4.7 Clearly, these represent wholly unrealistic delivery rates which not only justifies the need for the Council to present a more detailed, site-specific housing trajectory, but warrants the Council to decrease the 2,740-dwelling figure assumed for supply within the plan period.
- 4.8 In considering the likely lead-in times and delivery rates of large strategic settlements, Lichfield's *Start to Finish* research has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; the emerging Mendip Local Plan; and the emerging Doncaster Local Plan).
- 4.9 *Start to Finish* (Second Edition) identifies that the average timescale of validation of an outline application to completion of the first dwelling for sites of over 2,000 dwellings is **8.4 years**⁶.

⁵ DSP Paragraph 89

⁶ Lichfields *Start to Finish* (Second Edition) Figure 4

4.10 Notwithstanding that an outline planning application on land at UK Central Hub has yet to be submitted, the research also finds that the average build-out rate for sites of over 2,000 dwellings is **160 dpa**⁷.

4.11 Consequently, even if an outline planning application for the proposals at UK Central Hub were to be submitted to align with the Examination in Public, the build-out rates implied by the Council, as above, are wholly unrealistic. The assumed delivery by the Council of 2,740 dwellings by 2036 should therefore be decreased to a more realistic rate equating to 160 dpa from 2029, or 1,120 dwellings.

Tests of Soundness

4.12 St Philips considers that the policy approach Policy UK1 would not meet the tests of soundness because:

- 1 **It is not justified:** In failing to demonstrate the rate at which housing at UK Central Hub will deliver, an unrealistic and ambitious figure of supply within the plan period has been assumed. The Council has failed to provide any evidence justifying how 2,740 dwellings will be delivered within the plan period.
- 2 **It is not effective:** The policy is ineffective as it does not state the housing capacity allowed for by the allocation. Additionally, it is not deliverable over the plan period given the lack of justification that the identified level of housing will be delivered within the plan period.

Recommended Changes

4.13 In order to ensure that the Policy approach taken is sound, it is considered that:

- An indicative housing capacity figure should be explicitly referenced in the Policy text;
- The anticipated housing supply figure of 2,740-dwellings, as referenced at paragraphs 89 and 222 (the housing land supply schedule), should be decreased to a more realistic rate equating to 160 dpa from 2029 to 2036, or 1,120 dwellings.

4.14 In order to provide the requisite number of units arising from this shortfall in delivery, and as identified elsewhere, land at Stratford Road, Hockley Heath is able to provide up to 37 dwellings as a logical extension to the settlement.

⁷ Lichfields *Start to Finish* (Second Edition) Figure 7

Appendix 1

DEVELOPMENT VISION

**Land at Stratford Road, Hockley Heath
Solihull Metropolitan Borough**



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1 Introduction

The Vision Document has been prepared by St Philips to promote land at Stratford Road, Hockley Heath for the sustainable development of new market and affordable homes.

This document has been prepared to assist in the promotion of part of the overall site through the Solihull Metropolitan Borough Council Local Plan Review.

The wider development site includes land within both Warwick District Council and Solihull Metropolitan Borough Councils domains. An overarching Concept Phasing Masterplan has been prepared to illustrate the overall proposal.

St Philips is an established, highly skilled land promoter who specialise in delivering land for residential and mixed use development taking it through the planning and value engineering process.

St Philips consider that the land at Stratford Road should be removed from the Green Belt and allocated for residential development to assist in meeting the objectively assessed housing needs of Solihull Metropolitan Borough Council for the period to 2028.

The key aspects of the document are to:

- Provide an assessment of the planning and transport related constraints and to understand the opportunity afforded by the site.
- To set out a vision for the site to show how the delivery of new homes can be realised through the provision of an illustrative masterplan.
- To analyse the role of the site and demonstrate a clear justification for removal of the site from the Green Belt.
- To provide a focus for discussion with the Council and Key Stakeholders.

In preparing the document St Philips has appointed a team of expert technical consultants, who have analysed the physical environment and technical suitability of the site. The team has prepared detailed technical evidence to demonstrate that the site is deliverable.

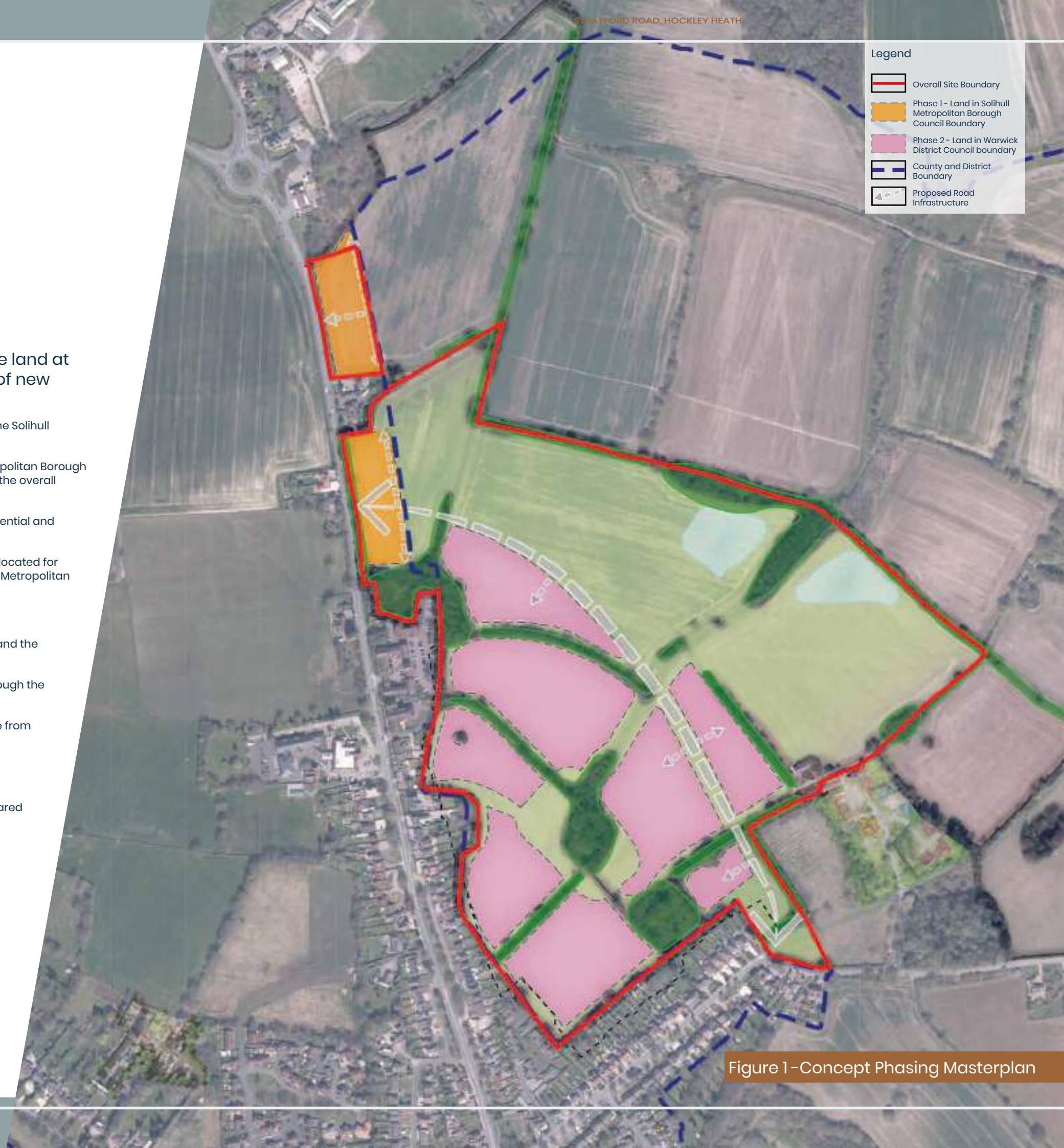


Figure 1 – Concept Phasing Masterplan

2 Site Context

Site Location

The site comprises approximately 46ha of land to the north east of Hockley Heath, bordered by Stratford Road to the west, Box Trees to the north and Aylesbury Road to the south.

The land within SMBCs domain and the subject of this Development Vision totals approximately 1.7ha and is located adjacent to the Stratford Road.

The overall site is currently in agricultural use.

A number of public rights of way cross the overall site. Adjacent to the SMBC parcels there are PRowS (footpaths) SL45 and SL44.

Hockley Heath is located to the south west of the parcels and contains a number of local facilities.

To the north east of the site separated by intervening countryside is Dorridge.

The SMBC parcels sit adjacent to the Stratford Road and feature a continuous mature mixed native hedgerow. The southern parcel also includes approximately six mature hedgerow trees.

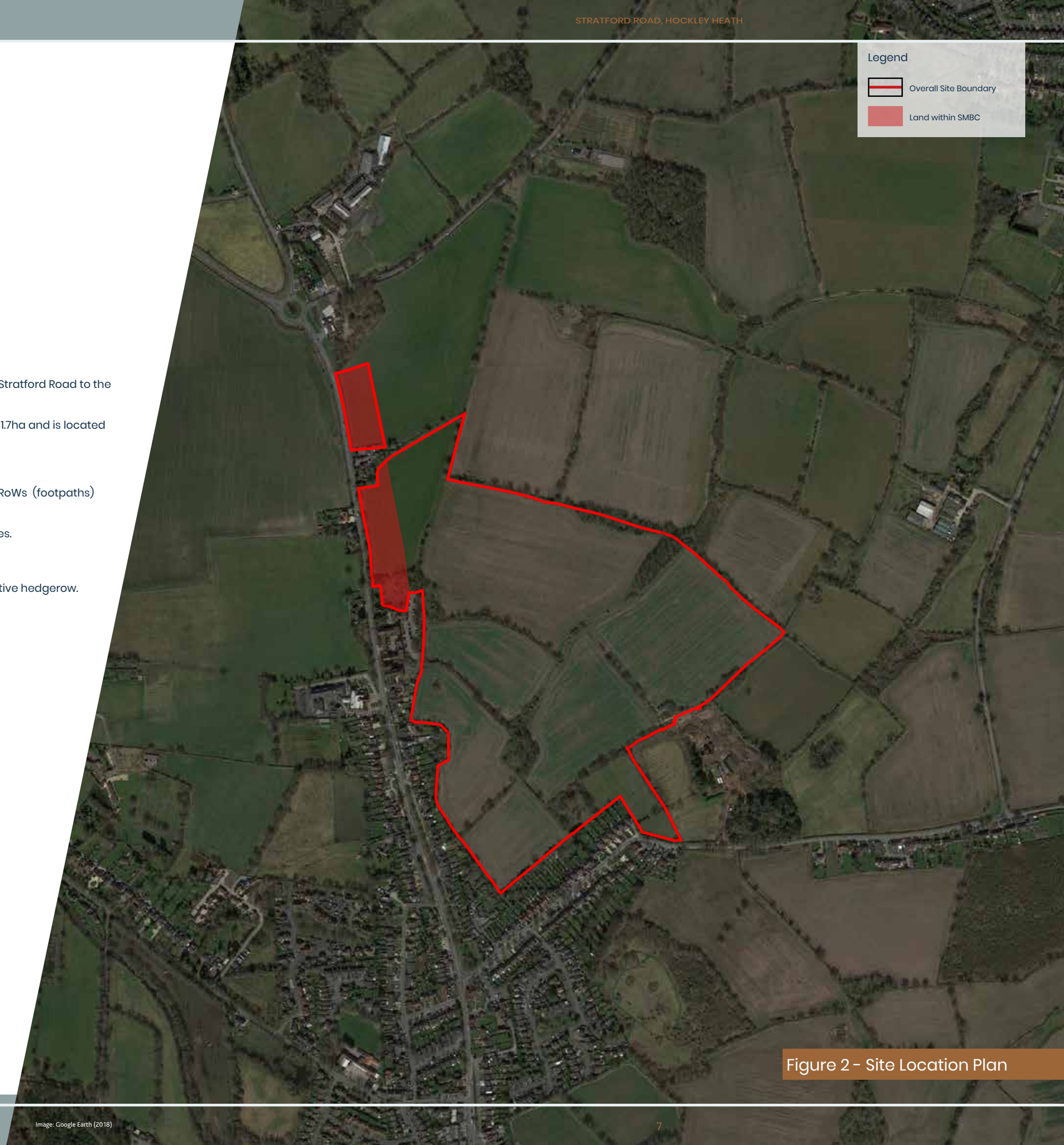


Figure 2 – Site Location Plan

3 Planning Policy

Introduction

Both the Solihull Local Plan and Warwick Local Plan will need to be reviewed to ensure that the relevant policies for the supply of housing remain up to date, and to ensure that the planning policy framework for each area remains robust and can fulfil the need to deliver sufficient new homes to meet the needs of local people.

The wider site falls partially within Solihull Metropolitan Borough Council's ('SMBC') administrative area, however, the majority of the site lies within the boundary of Warwick District Council ('WDC'). The land therefore has the potential to contribute to the housing needs of both LPA's.

The relevant planning policy framework is therefore assessed below for both Solihull and Warwick;

Adopted Planning Policy

Solihull Local Plan (2011-2028)

The Solihull Local Plan was adopted in December 2013. The plan sets out the long term spatial vision for how towns, villages and countryside will develop and change over the plan period (2011-2028). Within the policies map, the wider site is located within the designated Green Belt.

Policy P5 states that the Council will allocate sufficient land for 3,960 net additional homes to ensure sufficient housing land supply to deliver 11,000 additional homes in the period 2006-2028.

Notwithstanding this, a legal challenge was submitted to the High Court in 2014 by Gallagher Estates (Lowbrook Farm) and LionCourt Homes (Tidbury Green Farm). The appeal succeeded on 2 of the 3 grounds raised against SMBC, which related to the housing need figures used in developing the plan, and its method used to assess revisions to the Green Belt boundary. As such, SMBC is now required to reconsider its housing needs and policies for the supply of housing.

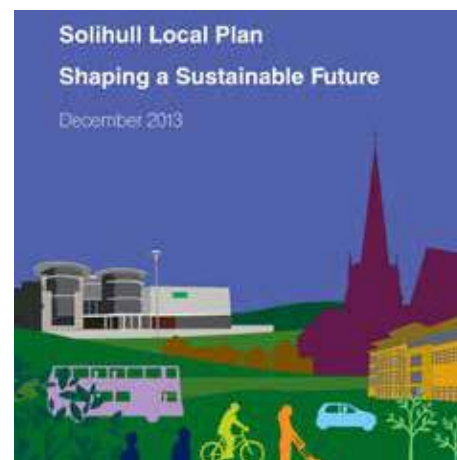
Warwick District Local Plan 2011-2029

The Warwick District Local Plan 2011-2029 ('WLP') was adopted by the Council in September 2017 and sets out the Council's vision and strategy for the District and how development will be accommodated to the year 2029. Within the adopted Policies Map, the wider site is located within the designated Green Belt.

In terms of housing growth, Policy DS2 sets out that the Council will provide a sufficient number of homes to deliver the identified Objectively Assessment Need. The wider site surrounds the Aylesbury House Hotel site, which forms a strategic allocation (Site H18) in the Local Plan for the delivery of 20 dwellings.

Policy DS6 'Level of Housing Growth' states that provision will be made for a minimum of 16,776 homes over the plan period equating to 600 dwellings per annum (dpa) between 2011/12 to 2016/17 and 1,098 dpa from 2017/18 to 2028/29.

'The Updated Assessment of Housing Need: Coventry-Warwickshire HMA' (September



2015) indicates that Warwick District's objectively assessed housing need is 600 dpa, equating to 10,800 dwellings over the plan period. However, it is recognised that Coventry City Council is unable to accommodate its housing needs in full within the city boundary, and so the WLP seeks to provide for 5,976 homes over the plan period (equating to 332 dpa) to help meet Coventry's housing needs.

Policy DS7 'Meeting the Housing Requirement' allocates a total of 17,139 dwellings within the plan to meet this need.

Policy DS19 states that the WLP will be reviewed (either wholly or partially) prior to the end of the plan period. Notwithstanding this, the Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on it will commence immediately.

Duty to Co-operate

Both SMBC and WDC have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities.

Birmingham's Housing Need

Policy PG1 of the Birmingham Development Plan 2011-2031 (adopted January 2017), sets out the level of housing growth required over the plan period of 51,100 dwellings. Notwithstanding this, it also confirms that Birmingham's OAN for the plan period is 89,000 additional homes, including approximately 33,800 affordable dwellings. It is not possible to deliver all these additional homes within the City boundary.

The policy continues and sets out that Birmingham City Council will continue to work actively with neighbouring Councils through the Duty to Cooperate, to ensure that appropriate provision is made elsewhere within the Greater Birmingham and Black Country Housing Market Area (HMA), to meet the shortfall of 37,900 homes.

The 14 Local Authorities within the HMA commissioned GL Hearn to prepare a HMA wide "Strategic Growth Study". The purpose of the study is as follows:

"The scale of the housing shortfall in the Greater Birmingham and Black Country Housing Market Area has been formally acknowledged through the adopted Birmingham Development Plan and the PBA Strategic Housing Needs Study. The purpose of this study is to build on this and other evidence to identify more specific options and broad locations for addressing the shortfall, which can be delivered by the market."

The outcome from this study has now been published and has refreshed the position regarding housing need, taking into account the Governments draft standard methodology, but also the most up to date position regarding land supply. It is clear that this study forms an independent review which each Council will need to take into account in identifying their considered options going forward.

The analysis indicates that, based on current supply assumptions and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA.

SMBC has been working with its partners to address the shortfall identified in the Greater Birmingham Housing Market Area. In addition, the Council are addressing the need for 2,653 dwellings arising from Solihull itself, together with the potential to accommodate a further 2,000 dwellings from the wider HMA shortfall.

Coventry and Warwickshire's Housing Need

As previously stated, it has been confirmed through 'The Updated Assessment of Housing Need: Coventry-Warwickshire HMA' (September 2015) that Coventry City is unable to accommodate its housing needs in full within the city boundary. As a result, Warwickshire District will seek to provide an additional 5,975 homes over the plan period to address this shortfall.

As a result of both of these wider HMA shortfalls, each authority will need to bring forward new options for growth through separate Local Plan Reviews.

Standard Methodology

The Government has stated its commitment to significantly boost the supply of housing land, and is addressing this through a number of initiatives, including reforms to the planning system.

The Government published a revised National Planning Policy Framework (NPPF) in July 2018, which included the formal adoption of the standardised methodology for calculating housing need, first introduced within the Housing White Paper (February 2017).

With regard to Warwick District, the standard objectively assessed need suggests that 623 dwellings per annum (dpa)

are needed, compared to 600 dpa currently identified within the Local Plan. Given the acknowledged need for growth from Coventry to be accommodated, it is also relevant to identify their revised need, which rises to 2,239 dpa compared to 2,120 currently identified within the Local Plan.

In terms of Solihull, this will have implications with regard to housing growth, with the standard method suggesting a need of 732 dwellings per annum, against 689 currently proposed.

Emerging Planning Policy

Warwick District Council Policy DS19 states that the WLP will be reviewed (either wholly or partially) prior to the end of the plan period. Notwithstanding this, the Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on it will commence immediately.

In light of the Council's increase in housing need as a result of the standard methodology, it is likely that a review of the Warwick Local Plan to accommodate additional growth will be needed by 2021.

Solihull Metropolitan Borough Council

Following a legal challenge through the High Court, SMBC have initiated a Local Plan Review. To date, the Council has prepared a Draft Local Plan (DLP) which was subject to consultation, concluding in February 2017.

Following the introduction of the standard methodology and the evidence produced from the Strategic Growth Study, the Council are proposing to continue their Local Plan Review based upon the work undertaken to date.

However, the Council acknowledge that these new policies will impact their housing numbers, so they have suggested that, before the draft submission plan is prepared, there is an opportunity to seek views on additional/alternative sites that may be required to either accommodate an increase in housing numbers and/or replace sites that may not be taken forward from the Draft Local Plan into the submission version.

The Council have proposed an additional, supplementary stage of consultation which will focus on the following:

- Identifying potential additional and alternative sites; and
- A review of the overall housing numbers in the context of the Standard Methodology.

It is expected that this consultation will be undertaken in winter 2018/19, with the publication of the submission draft pushed back to summer 2019.



Green Belt Assessment

The NPPF (2018) sets out the five purposes of the Green Belt, as set out 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.

Any future Green Belt Review will assess Green Belt sites against the main functions of the Green Belt in order that they can be compared and the most sustainable sites allocated for residential development.

For the purpose of the Vision Document, St Philips have therefore prepared an initial assessment of the wider site against the five purposes of the Green Belt in order to demonstrate the potential to release the site from the Green Belt.

To check the unrestricted sprawl of large built-up areas

The West Midlands Metropolitan Green Belt was formally designated in 1975, with the key aim to prevent the unrestricted sprawl of the key conurbations of Birmingham, Solihull and the Black Country and to prevent the coalescence of Birmingham and Coventry.

The site is not part of the larger, built-up areas of the West Midlands Green Belt but is a logical extension to the settlement of Hockley Heath. The site is modest in size and is bound by permanent physical features in all directions which would ensure development of the wider site remains contained and has negligible impact on the remaining Green Belt.

There is existing development to the south of the site in the form of residential properties that form ribbon development along Aylesbury Road and Stratford Road. The proposed development will not extend beyond the limits of this current development, and will provide visual buffer planting along the northern site edge to create a defensible boundary.

Given the permanent physical features to all the boundaries of the site, it is considered that removal of the site from the Green Belt would not result in unrestricted urban sprawl of large built up areas. Furthermore, Hockley Heath is not considered to be a large built-up area in the context of the original designation of the West Midlands Metropolitan Green Belt.

To prevent neighbouring towns from merging into one another

The nearest neighbouring settlement to the site and Hockley Heath is Dorridge to the north east. Although the development would extend Hockley Heath in this direction, the permanent physical features bounding the site, as previously described, would not cause the gap between Dorridge and Hockley Heath to be adversely compromised.

Moreover, even allowing for the development of the wider site, the gap between Dorridge and Hockley Heath would still be a distance of over 1km, which is considered to be an acceptable distance.

Based on the above points, development of the wider site would not cause neighbouring towns to merge into one another.

To assist in safeguarding the countryside from encroachment

The development of the wider site would be a natural extension to the existing built-up area of Hockley Heath and is contained by permanent physical features, which have already been highlighted. These features would prevent encroachment into the wider countryside.

Additionally, the extent of countryside already surrounding the wider site is considered to be robust, and which would not be adversely affected by the development of the wider site. The development of the site would not, therefore, contravene the Green Belt purpose of safeguarding the countryside from encroachment.

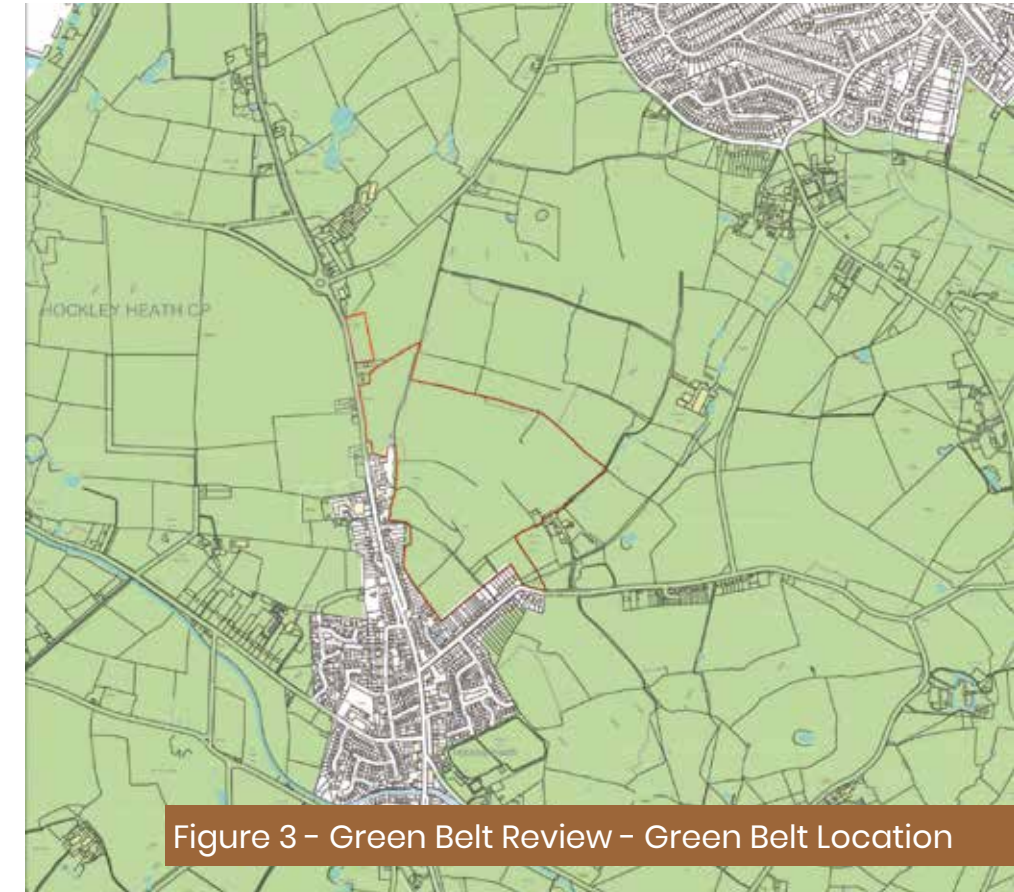


Figure 3 – Green Belt Review – Green Belt Location



Figure 4 – Green Belt Review – Settlement Separation Gap

To preserve the setting and special character of historic towns

The settlement of Hockley Heath is not a nationally recognised historic town, although it has historic elements within it. The development of the wider site would not affect the setting of the village.

Thus, there would be impact on the setting or special character of historic towns as a result of the development of the wider site.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The removal of the wider site would not affect the potential for either Solihull Metropolitan Borough Council or Warwick District Council, or other stakeholders with an interest in land and property within these areas, to facilitate urban regeneration through the recycling of derelict or other urban land.

The Green Belt Assessment Summary

The development of the site would not compromise the five purposes of the Green Belt in that:

- It would not result in the unrestricted sprawl of the large, built-up areas of Birmingham, Solihull or the Black Country;
- The wider site would not merge with key neighbouring towns and settlements, including Dorridge, and the development of the wider site would have negligible impacts on the separation distances between these places;
- Encroachment into the wider countryside is prevented by the self-contained nature of the wider site which is bound by permanent physical features including the provision of additional buffer planting;
- There would be no impact on the setting or special character of historic towns as a result of the development of the wider site;
- Development of the wider site would not prevent or discourage the recycling of derelict or other urban land within the District.

Overall, the development of the wider site and its removal from the Green Belt would not undermine the purposes of the Green Belt as defined in paragraph 134 of the NPPF. For these reasons, the site is considered to be suitable for housing.

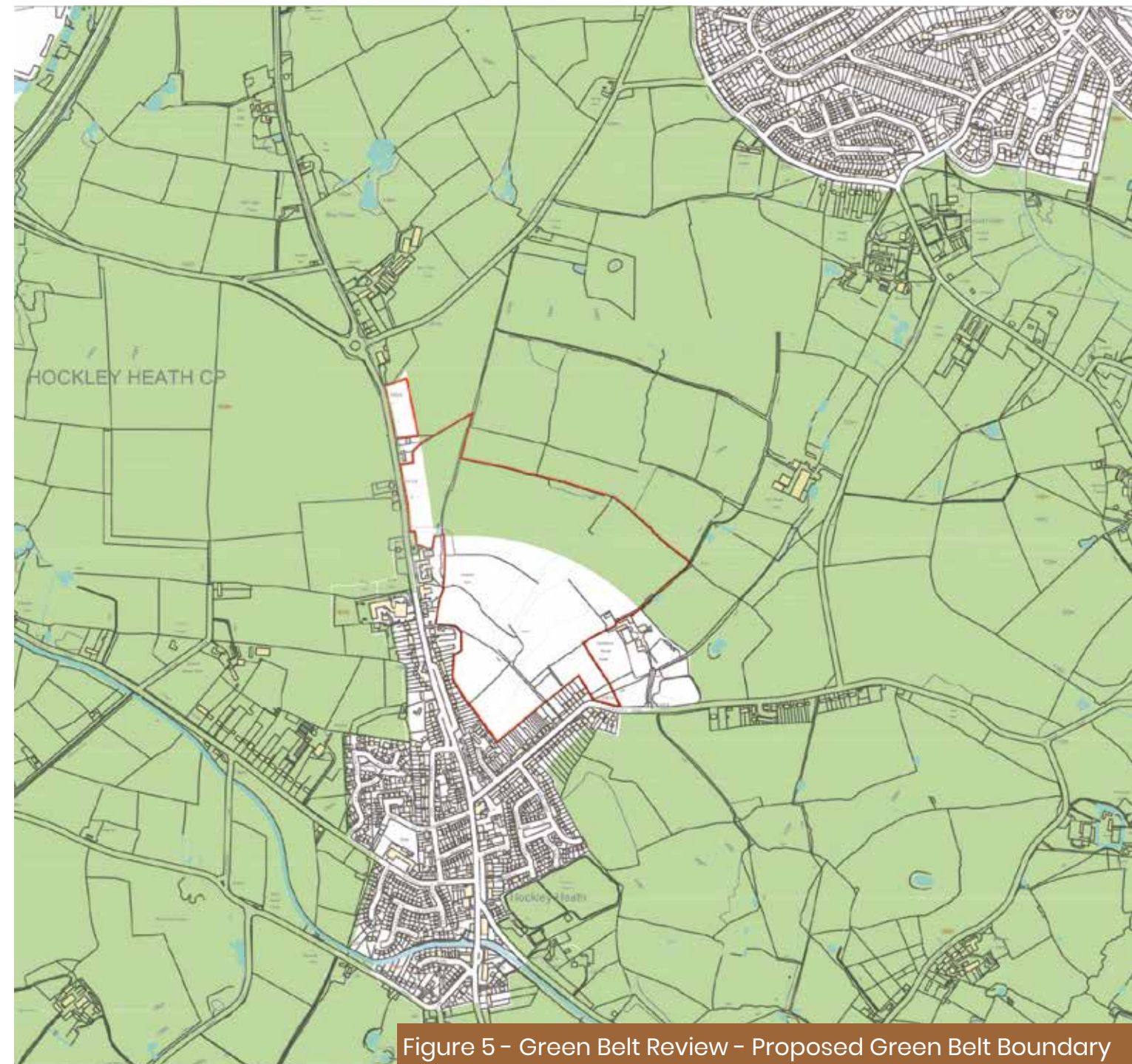


Figure 5 – Green Belt Review – Proposed Green Belt Boundary

4 Accessibility

Local Facilities

The analysis set out below demonstrates that the site is in a highly accessible location and is well served by local facilities. It is therefore positioned in a location that would be optimal for residential use.

The site is well located in order for residents to access a range of key local amenities and facilities. Hockley Heath village centre is located south west of the proposed site and includes a convenience store within an approximate 10 minute walk journey time (0.8km). A Post Office, Dental Surgery and Primary School are also located within an approximate 14-minute walking journey (1.2km).

Table 1: Local Facilities

Local Facility	Proximity to Centre of Site	Walking time to Site
Formal Sports	Hockley Heath Recreation Ground - 900 metres	15 minutes
Education -Primary	Hockley Heath Academy - 800 metres	15 minutes
Health	Hockley Heath Dental Surgery - 800 metres	15 minutes
Food	OneStop village store - 600 metres	10 minutes
Retail	Dorridge Town Centre - 1.2 km	40 minutes
Bus	Stratford Road - 320 metres	5 minutes
Rail	Dorridge Station - 2km	40 minutes
Public House	Beefeater Barn - 370 metres	5 minutes

Transport

Stratford Road operates in a north south alignment to the west of the proposed site. It provides access from the site to the strategic road network, connecting to the M40 approximately 3km south of the proposed site and the M42 junction 4 approximately 2.5km north of the site.

A footway exists on the eastern side of Stratford Road in the vicinity of the site, continuing south to the Village centre and the amenities located there.

There is no formal cycle infrastructure in Hockley Heath, however there are many lightly trafficked local roads that provide an environment conducive to cycling and a local cycle route which runs along the pavement adjacent to Stratford Road to the north of Hockley Heath. Many routes in and around Hockley Heath do not provide segregation from traffic however, they are considered suitable for confident cyclists.

Existing bus stops located on Stratford Road and Aylesbury Road are served by buses that provide connections to key destinations with significant amenities, including Solihull and Birmingham.

The Site

Access will be provided into the development site from a priority junction on Stratford Road. This junction will also serve any east facing properties within the SMBC land.

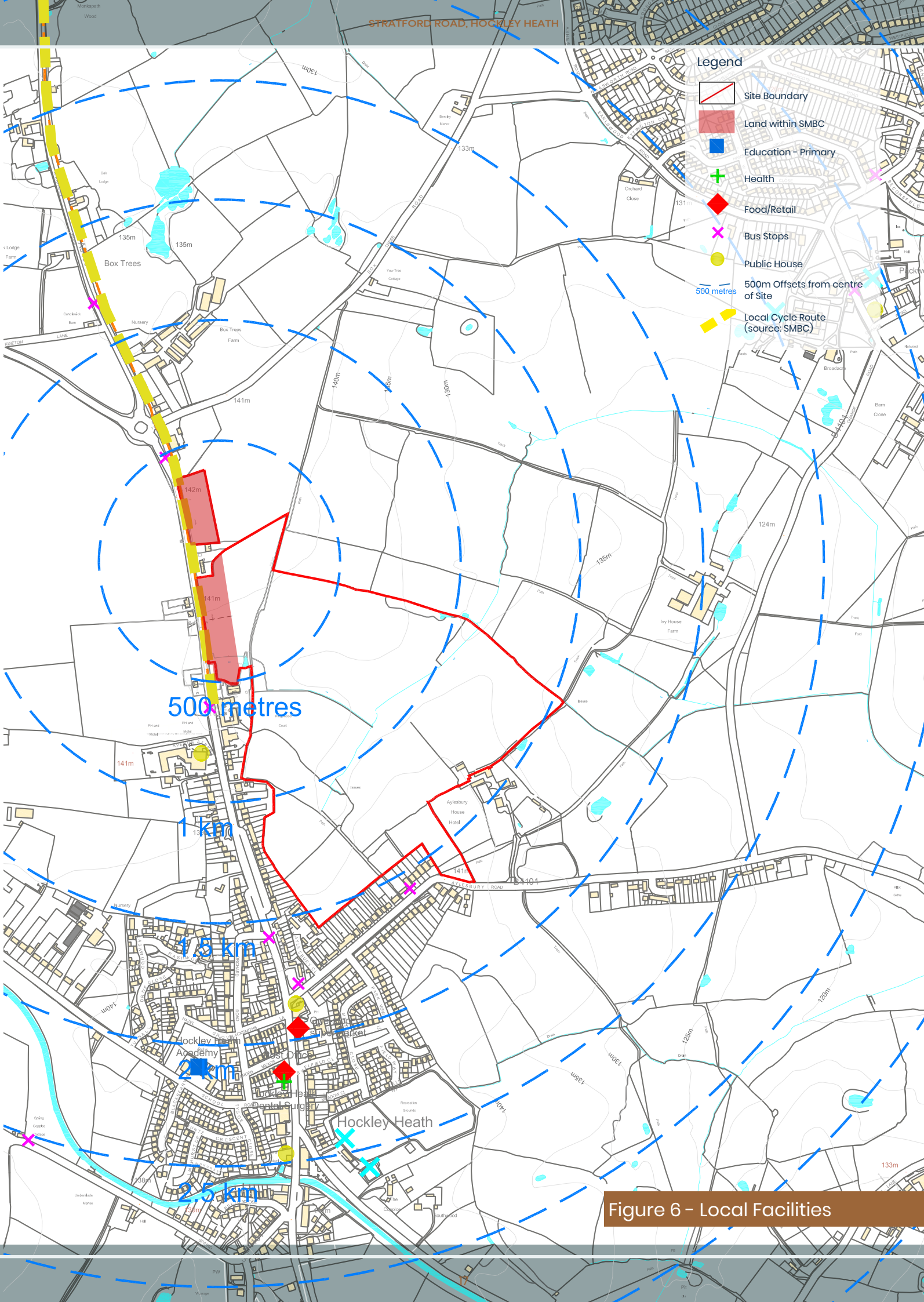


Figure 6 - Local Facilities

5 Concept Masterplan

The concept masterplan provides a mixture of dwelling types and tenures in accordance with SMBC policy.

The layout provides a hybrid of density with linear and block development, whilst maintaining spacious dwellings that meet the relevant standards.

The main vehicular access to the second phase of the development is located via a priority junction within the southern parcel.

Each property incorporates sufficient driveways and hard standing for vehicles to safely manoeuvre and access Stratford Road.

The northern plot reverts to linear development to sensitively integrate with the existing built form to the north of Stratford Road.

The existing hedgerow and belts of trees along Stratford Road are retained and incorporated into the emerging layout.

There is pedestrian and cycle connection to the existing local cycle route on Stratford Road, via the pavement at the priority junction.

Table 4: Housing Mix.

Requirement for all new housing between 2014 and 2033			Proposed Units		
Type	Abbr	% Contribution	Open Market	Affordable	Total Units
1 bed flat	1BF	9%	1	2	3
1 bed bungalow	1BB	4%	1	0	1
2 bed flat	2BF	12%	2	2	4
2 bed bungalow	2BB	5%	1	1	2
2 bed house	2BH	8%	1	2	3
3 bed house	3BH	32%	6	6	12
4+ bed house	4BH	30%	6	5	11
Total			19	18	37



Figure 7 - Concept Masterplan

6 Executive Summary

There is an opportunity to provide a substantial number of dwellings on these two parcels of land that can meet SMBC policy, contribute to housing requirements and are sympathetic to Hockley Heath's existing built form and vernacular.

The Vision

- Provide a sustainable mix of housing to meet local need including an element of market, affordable and new starter homes.
- Cater for a diverse population including the elderly and young people
- Retain existing landscape features and incorporate new planting to create a green infrastructure for the enjoyment of residents and benefit of local wildlife
- Integrate existing public rights of way with new footpaths and cycleways to offer a network of safe and convenient routes
- Protect heritage assets outside of the site.
- Use existing site features and local cues to generate a distinct identity.

Development Principles:

- Strong vision, leadership and community engagement
- Long-term stewardship
- Mixed-tenure homes and housing types that are genuinely affordable for everyone
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy, neighbourhoods.
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

Deliverability

To be considered deliverable, sites should offer a suitable location for development, be readily available and be achievable with a realistic prospect that new housing will be built within the first few years of the local plan period.

The site is achievable and can be brought forward for development into the first few years. It is envisaged that St Philips would deliver new housing on the land under its control.

Importantly, the site is viable and will deliver the key community, social, and physical infrastructure required to meet the needs of new residents. This will include affordable housing and open space, along with necessary developer contribution to social and community or physical infrastructure.



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