

Solihull Local Plan – Draft Submission Plan (October 2020)

Representations on behalf of ZF Automotive
UK Ltd in respect of Land south of Dog Kennel
Lane (Policy BL2)

December 2020

Turley

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Client

ZF Automotive UK Ltd

Our reference

COLQ3003

14 Dec 2020

1. Introduction

- 1.1 These representations are made on behalf of ZF Automotive UK Ltd (hereafter referred to as 'ZF') in response to Solihull Metropolitan Borough Council's Local Plan – Draft Submission Plan (DSP), which was published for consultation in October 2020.
- 1.2 ZF are the owners of Lodge Farm (the 'site'), 18 hectares (44.61 acres) of land off the A34, Solihull. A copy of a site location plan is attached at **Appendix 1**. This adjoins their former site which now forms The Green and is being brought forward for a mix of uses including housing.
- 1.3 The site forms part of proposed allocation 'Policy BL2 – South of Dog Kennel Lane' which is to be removed from the Green Belt and will provide 1,000 dwellings and associated development including a new school.
- 1.4 To date, and with ZF's support, Taylor Wimpey has promoted the wider proposed allocation 'Policy BL2 – South of Dog Kennel Lane'.
- 1.5 The purpose of these representations is to support the proposed allocation and confirm that it can be delivered within the plan period, either under one application or brought forward by two separate parties.

2. Response to the Draft Submission Plan

2.1 We set out below our comments on the following aspects of the plan:

- (a) Vision and Spatial Strategy
- (b) Housing policies
- (c) Policy BL2

Vision and Spatial Strategy

- 2.2 ZF supports SMBC's vision to provide a range of quality homes across the Borough by 2036 alongside maximising the economic and social benefits of HS2. The vision could be strengthened by identifying the important link between the provision of new employment opportunities and the requirement to deliver new homes. The two are intrinsically linked and together will ensure a prosperous future for Solihull.
- 2.3 ZF broadly supports the Spatial Strategy as set out in paragraphs 63 to 67 of the DSP, specifically to focus significant developments in locations that are, or can be made, accessible and sustainable. Shirley Town Centre and the A34 Corridor was identified as Growth Option D and the land at Dog Kennel Lane is one of the Large Scale Urban Extensions identified under Growth Option G. The spatial strategy would be more robust, however, if it set out a settlement hierarchy to guide site selection which would strongly support development on the edge of the main urban area around Shirley due to its connectivity to the town centres, railway stations, services and facilities.

Housing policies

Policy P4C Meeting Housing Needs – Market Housing

- 2.4 ZF supports the policy wording which states that the Council will negotiate the housing mix on allocated major development sites. This is a proactive approach that enables the delivery of allocated sites. However, it is considered that the remaining wording of the policy conflicts with SMBC's proactive approach.
- 2.5 The reference to the Concept Masterplans including *“details of the likely profile of household types requiring market housing, e.g. multi-person, including families and children, single persons and couples, as identified by the latest HEDNA”* is not required within this policy.
- 2.6 Point 1 of the policy states that the *“Current indicative Borough-wide needs assessments”* and *“The existing mix of market housing and local housing demand in the area”* will be considered in the negotiations relating to any market housing mix. Therefore the inclusion of profiles within the Concept Masterplan could lead to unnecessary confusion at the development management stage.
- 2.7 A specified mix of market dwellings, as set out at point 3, is not required within this policy given that point 1 provides the necessary links back to needs assessments available at the time the application is determined. This approach also conflicts with

paragraph 188 of the DSP which identifies that specific sites may result in a different mix of housing being delivered.

Policy P4D – Meeting Housing Needs – Self and Custom Housebuilding

- 2.8 ZF appreciates the flexibility built into the policy to enable an applicant to negotiate the amount and type of provision of self and custom homes at the point an application is submitted. The marketing period of 12 months is also welcomed as this will ensure that empty plots are not left once the site has been completed.

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

- 2.9 ZF supports the flexibility within the policy to take into account site-specific factors when applying Policy P4E but would welcome an additional criterion to ensure that where the Council's statement on older person's accommodation does not identify a need in the area local to the proposed development, an oversupply of such accommodation can be avoided, given the proliferation of provision along the A34 corridor.

Policy P5 – Provision of Land for Housing

Housing Need over the Plan Period (2020 to 2036)

- 2.10 It is positive to see SMBC allocating sites to ensure sufficient housing land supply to deliver 15,017 additional homes in the plan period which reflects a requirement based on Local Housing Need of 12,912 plus a 2,105 contribution to the Greater Birmingham HMA shortfall up to 2031.
- 2.11 We note that this includes an allowance for 2,740 from UKC Hub in addition to 5,270 from new allocations, of which the land south of Dog Kennel Lane (BL2) is the largest at 1,000 homes. A further 2,800 homes will come from windfalls.
- 2.12 It is therefore vitally important that the land south of Dog Kennel Lane comes forward as one of the largest single contributors to housing supply in the borough.

Concept Masterplans

- 2.13 At paragraph 243 of the DSP, it states that:

“...the concept masterplan will show a coordinated and comprehensive approach to the development of the site that is supported by relevant site promoters/developers so that piecemeal development is avoided. This needn't necessarily preclude a phased approach where one parcel of land or part of the site may be available for development in advance of another. However it will be expected that evidence can be provided of a joint and coordinated approach so that one phase of development does not prejudice a future phase, nor place undue viability pressures on a later phase to complete necessary infrastructure to serve the whole development.”

- 2.14 As the owner of the Lodge Farm site, which forms a significant part of the Stratford Road frontage to the overall site, ZF can confirm that it has supported Taylor Wimpey's promotion of the wider site to date and will be working collaboratively to ensure that a comprehensive and coordinated approach to the site is taken, whilst not precluding phased delivery.

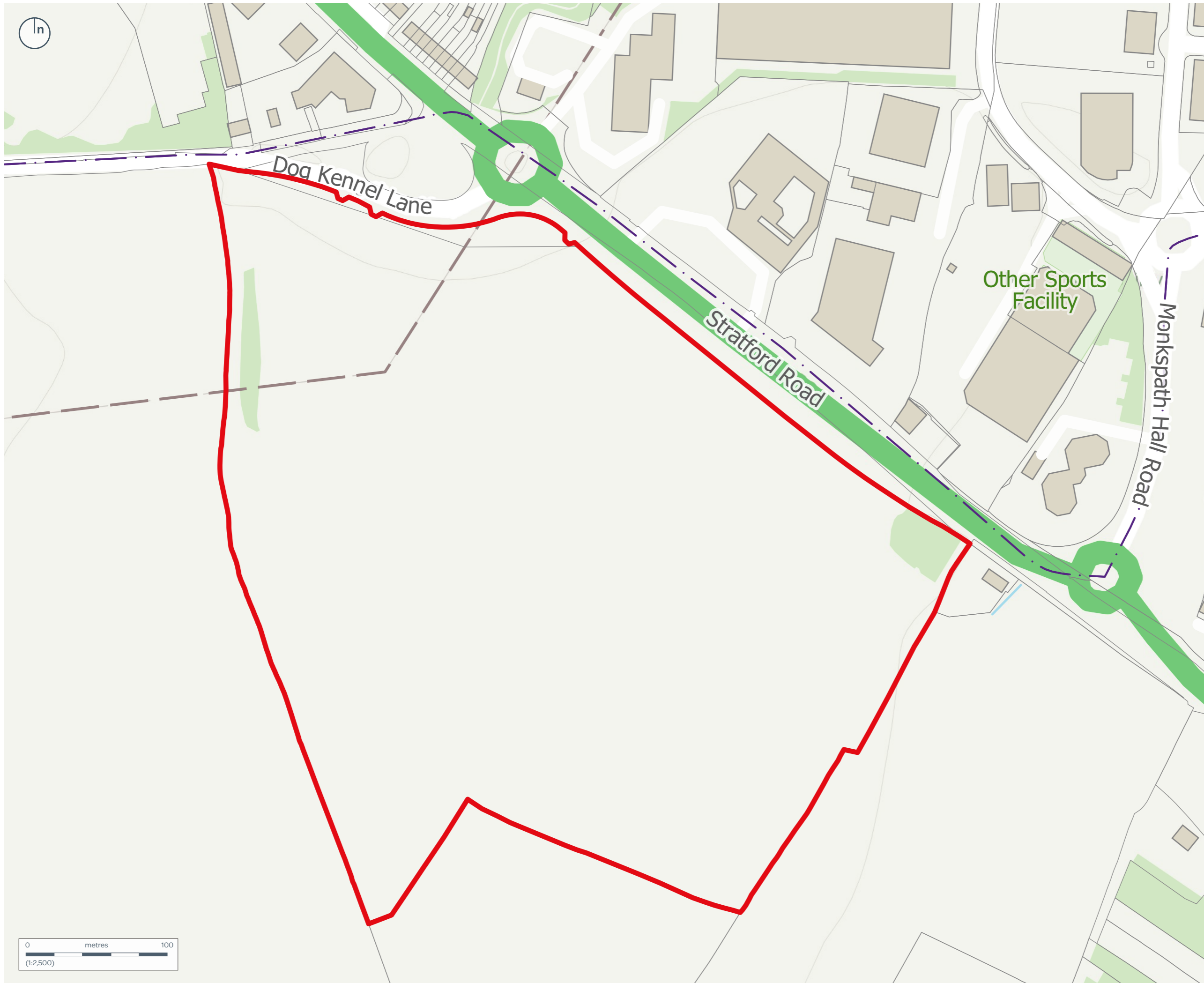
Policy BL2 – South of Dog Kennel Lane

- 2.15 ZF fully supports the proposed allocation of BL2 ‘South of Dog Kennel Lane’ for 1,000 homes. The Lodge Farm site forms a significant component of the allocation with a Stratford Road frontage, two points of access identified on the concept masterplan, and a mix of high, medium and lower density housing development parcels, allowing for delivery of on-site accommodation for older people and 5% of open market dwellings in the form of Self and Custom Build.
- 2.16 The location of the new 2-form entry primary school with early years provision on land adjoining the ZF site is welcomed as this will be central to the new development.
- 2.17 ZF acknowledges the requirement for public open space (POS) as well as a range of children’s play areas, flood alleviation measures in the form of above ground SuDS features and potential betterment for the Mount Brook tributary of the River Blythe. Not all of these can be delivered within the site and therefore will be coordinated with Taylor Wimpey in bringing the whole site forward.
- 2.18 ZF also acknowledges that developer contributions will be required for primary care health services in the vicinity and appropriate UHB secondary care services in the wider CCG catchment. In this regard, ZF is mindful of Policy P21 on Developer Contributions and the intention to review the CIL Charging Schedule. This will be an important factor in ensuring the viability of sites which have to deliver key elements of new infrastructure.
- 2.19 As compensation for the loss of Green Belt, the plan requires enhancements to include a Country Park to the south/west of the development, extending to the edge of Cheswick Green to provide greater access to the countryside, green infrastructure and opportunities to maximise biodiversity net gain. It is important that this is proportionate to the loss and should be comparable to the approach taken to similar proposed allocations. ZF owns other land to the west at Jerrings Hall Farm off Tanworth Lane which could form part of any biodiversity net gain.
- 2.20 The definition of the Green Belt boundary is unclear and the suggestion at paragraph 609 that internal estate roads should form the boundary with housing overlooking the Green Belt is questioned given its length. There are other ways of providing a suitable urban edge.

3. Conclusion

- 3.1 ZF is generally supportive of the Draft Submission Plan and specifically the proposed allocation of 'Policy BL2 – South of Dog Kennel Lane' which includes its Lodge Farm site, subject to the detailed comments made in section 2.
- 3.2 To date, Taylor Wimpey has promoted the wider allocation and ZF continues to support them and the technical work they have done in support of the allocation.
- 3.3 The purpose of making representations at this stage of the plan is to demonstrate commitment from the landowner that the site is deliverable, and that it will come forward in a coordinated way, whether as a single application or by more than one party.
- 3.4 ZF will continue to work with Taylor Wimpey and SMBC to ensure the allocation is planned comprehensively, that the necessary infrastructure and mitigation is provided, and that one of the most significant sites in the local plan is delivered.

Appendix 1: Site Location Plan



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KEY
 Application boundary

CLIENT:
 ZF Automotive UK Limited

PROJECT:
 Land off A34, Solihull

DRAWING:
 Site location plan

PROJECT NUMBER:
 COLQ3003

DRAWING NUMBER: 10_ **CHECKED BY:** FLM

REVISION: 00 **STATUS:** Final

DATE: December 2020 **SCALE:** 1:2,500 @ A3

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