
Solihull Local Plan Review

Consultation on Draft Submission Plan in accordance with Regulation 19 of the The Town and Country Planning (Local Planning) (England) Regulations 2012

Representations on behalf of Schools of King Edward VI in Birmingham

Land at Widney Manor Road, Solihull (Site 111)

December 2020

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- Appendix I Site Location Plan
- Appendix II 2017 Vision Document
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For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 Avison Young is instructed by the Schools of King Edward VI in Birmingham ('SKE') to submit representations to the consultation being carried out by Solihull Metropolitan Borough Council ('SMBC') in respect of the 'Draft Submission' version of the Solihull Local Plan Review (LPR).
- 1.2 This document should therefore be taken as our Client's comprehensive response to the consultation.
- 1.3 SKE controls land at Widney Manor Road ('the site'). Our Client's interest is shown on the Site Location Plan attached to these representations at **Appendix I**. The site has been ascribed the number 111 in the various assessments undertaken by SMBC and its consultant team, and so we refer to the site as Site 111 throughout these representations.
- 1.4 We have reviewed the consultation document on behalf of our Client. In its current form, our Client is of the view that the Plan is unsound for a number of reasons, which we set out in the remaining sections of this submission.
- 1.5 With this in mind, we structure our representations in the following way.
- **Section 2** briefly describes our Client's site.
 - **Section 3** comments on SMBC's housing need, the proposed housing target and the extent to which we think that SMBC has satisfied the Duty to Co-Operate.
 - **Section 4** comments on SMBC's planned housing supply, with reference to the conclusions on need that we reach in Section 3.
 - **Section 5** discusses, with reference to the LPR evidence base, SMBC's approach to site selection, and, in particular, focusses on the way in which our Client's site has been assessed by SMBC. It concludes by demonstrating that the site is a suitable location for development and should be allocated, thereby helping to remedy the defects with the Plan that we identify in the preceding sections.

2. Site Description

- 2.1 The site extends to some 3.9 hectares and is located to the south of Solihull Town Centre. It is bounded to the north by a small plot of undeveloped land on Lovelace Avenue (a private residential street), which is not in SKE's control. The remainder of Lovelace Avenue comprises residential ribbon development, which extends in an easterly direction. To the east and south, the land is immediately bounded by further agricultural land, although the River Blythe and the M42 motorway lie a short distance beyond the southern boundary. The south-western and western boundaries to the site are formed by Widney Manor Road. As such, the site has a direct frontage on to the public highway; access to the site is currently taken from Widney Manor Road. On the opposite side of the road is extensive residential development, and immediately beyond that is Widney Manor railway station. As a consequence of the proximity of the site to residential development on its northern and western sides, we conclude that it occupies a location that is very well related to the Solihull urban area.
- 2.2 The site comprises agricultural land. While the site boundaries are formed by hedgerow and tree planting, there is no tree planting in the remainder of the site and so it is open in character. The site slopes gently downwards from north to south.
- 2.3 A review of the Environment Agency's flood maps indicates that nearly all of the site is located in Flood Zone 1, and so is at low risk of flooding. Only a very small proportion of the site, concentrated along its southern boundary, is located in Flood Zone 2.
- 2.4 Furthermore, the site is not located in a conservation area, and we understand that there are no designated heritage assets located on it, or in close proximity to it. Information published by DEFRA indicates that the site is not subject to ecological designations.
- 2.5 A review of the DEFRA Magic Map indicates that the site is classified as Grade 4 Agricultural Land. Accordingly, it does not comprise Best and Most Versatile Agricultural Land.

Accessibility to Services

- 2.6 We have noted already that the site is located close to Widney Manor railway station, which provides frequent local rail connections to the principal centres of Birmingham and Solihull, in addition to other large centres including Stratford-upon-Avon, Worcester and Kidderminster. The site is less than 200 metres from the station (measurement taken from the western boundary). We conclude that the site is therefore in easy walking distance of the railway station.

- 2.7 Widney Manor Road is located on a bus route, with bus stops situated on both sides of the road to the south of its junction with Widney Lane, directly adjacent to the site. The site is therefore well within a 400 metre walking distance of these bus stops.
- 2.8 We understand that these bus stops are served by routes A3 and A3W. Together, the routes provide direct bus links to Dorridge, Bentley Heath, Solihull Town Centre and Cheswick Green during the day time and at morning and evening peak hours, from Monday to Saturday. Further bus stops are located on Widney Lane, adjacent to Widney Manor Railway Station. These stops are served by National Express route 5, which operates a high frequency service between Birmingham and Solihull, seven days per week.
- 2.9 As a result of the site's proximity to the urban area of Solihull, there are a number of education facilities in this part of Solihull which are capable of being accessed from the site. There are a number of primary and secondary schools located within 2 miles of the site. Similarly, there is a doctor's surgery (Monkspath Surgery) and hospital (Solihull Hospital) located within the same distance.
- 2.10 In terms of convenience shopping facilities, our research shows that there is a Co-Op store at Monkspath, Aldi and Waitrose stores in Solihull, a large Sainsbury's store in Dorridge, and Tesco stores in Knowle and Monkspath that can be reached from the site by public transport (bus or rail) or within a five-minute drive.

Summary

- 2.11 The site is located immediately adjacent to the Solihull urban area and is well-related to it. The site is located within a short walk of a railway station and there are two bus stops adjacent to the site boundary. The rail and bus facilities provide access to jobs and facilities in the principal settlements of Solihull and Birmingham, as well as in smaller settlements to the south, such as Bentley Heath and Dorridge.
- 2.12 As a consequence, there are a range of education, health and shopping facilities which can be accessed from the site by car and by public transport.
- 2.13 The site itself is almost entirely located in Flood Zone 1 and is at low risk of flooding. It does not comprise Best and Most Versatile Agricultural Land. There are no designated heritage assets located on it, or in close proximity to it.
- 2.14 For all of these reasons, we conclude that the site occupies a sustainable location that it is suitable for new residential development.

3. Housing Need, the Housing Target and the Duty to Co-Operate

3.1 The National Planning Policy Framework (NPPF) establishes a 'presumption in favour of sustainable development', which, amongst other things, requires that, *"plans should positively seek opportunities to meet the development needs of their area"* and that *"strategic policies should, as a minimum, provide for objectively assessed needs for housing"*. The 'presumption' provides that if an LPA proposes not to meet objectively-assessed needs, this will only be where national policies provide a *"strong reason"* or where the *"adverse impacts"* of doing so would *"significantly and demonstrably outweigh the benefits"*.

3.2 This carries through to Paragraph 35 of the NPPF, which establishes the tests of soundness that all local plans must satisfy. In order for plans to be *"positively prepared"*, the NPPF says that they must provide 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 authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development".

3.3 Similarly, the tests of soundness include an obligation on local planning authorities to ensure that plans are *"justified"* and based on *"an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence"*.

3.4 These requirements are also found at Paragraph 24 of the NPPF, which confirms that local planning authorities are under a duty to co-operate with each other on cross-boundary strategic matters, and at Paragraph 26, which says that *"effective and on-going joint working between strategic policy-making authorities"* is *"integral to the production of a positively prepared and justified strategy"*.

3.5 Further still, Paragraph 60 of the NPPF goes on to state,

"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 – 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."

- 3.6 It is with these matters in mind that we consider the approach the Council has taken to meeting its housing need and to meeting the unmet needs arising in the housing market area.
- 3.7 The Draft Submission Plan identifies, with reference to a Housing and Economic Development Needs Assessment (HEDNA) prepared for SMBC by GL Hearn, a need for a minimum of 807 dwellings per annum to be delivered in the Borough between 2020 and 2036. This equates to a total local housing need (LHN) of 12,912 dwellings. The figure of 807 dwellings per annum is based on the application of Government's Standard Method.
- 3.8 The HEDNA goes on to make a recommendation that SMBC should plan for in-migration and population growth associated with the delivery of the UK Central Hub Area. Making an allowance for this, the HEDNA concludes that the housing need for the Borough should be set at 816 dwellings per annum (equating to a total of 13,056 units over the plan period).
- 3.9 The Draft Submission Plan takes forward this recommendation and proposes a housing need figure of 13,056 dwellings for the Plan.
- 3.10 Solihull forms part of the Greater Birmingham Housing Market Area (GBHMA). SMBC acknowledges that the Birmingham Development Plan (BDP) (adopted in January 2017) identifies a shortfall of 37,900 homes which must be delivered in the GBHMA between now and 2031. SMBC states that it has been working with authorities in the HMA to reach agreement on how the shortfall can be addressed.
- 3.11 At Paragraph 228 of the Draft Submission Plan, SMBC states that it has given a commitment through the LPR process to test the Borough's ability to accommodate 2,000 dwellings of the shortfall arising from within the HMA. SMBC goes on to say that it has completed that testing and has concluded that it can make a contribution of 2,105 dwellings to the HMA shortfall. The Council confirms that this figure is the difference between the Borough's local housing need (12,912 dwellings) and the capacity for new residential development in the Borough (15,017 dwellings).
- 3.12 With these contextual matters in mind, we go on to comment below on the following points, which have implications for the robustness of the Council's approach, and the soundness of the Plan:-
- The Standard Method;
 - unmet needs and the Duty to Co-Operate; and
 - safeguarding of land that is currently in the Green Belt.

The Standard Method (SM)

- 3.13 The Government has challenged Local Planning Authorities (LPAs) to deliver 300,000 dwellings per year in order to address what it acknowledges is a chronic shortage of housing in the UK. The LHN for each LPA in the UK, calculated using the current SM (2018), is a minimum figure. LPAs can propose higher targets if they wish to. If the minimum LHN figures for each of the LPAs (calculated using the 2018 SM) are added together, the total number of homes delivered per annum would be approximately 270,000 (i.e. 30,000 homes short of the Government target of 300,000 homes per annum).
- 3.14 SMBC has used the current (2018) version of the SM to calculate that Solihull's local housing need (LHN) figure for the plan period (2020 to 2036) is 12,912 dwellings, or 807 dwellings per year. This figure comprises the majority of the housing need figure identified in the emerging Solihull Local Plan.
- 3.15 If the Government's target is to be achieved, LPAs must deliver in excess of the minimum LHN calculated using the 2018 SM. However, very little evidence has emerged of LPAs increasing numbers beyond their minimum LHN.
- 3.16 Furthermore, the methodology deployed in the 2018 SM is, to a significant extent, based on projections of household growth. On its face, this appears appropriate. However, it has created a reverse effect in some LPAs. Historic under supply of housing in areas of high demand has lowered rates of migration and household formation which in turn has driven down projected levels of growth leading to lower LHN calculations.
- 3.17 Perhaps of greater concern is the disconnect between the 2018 SM and the target of 300,000 dwellings per year. Put simply, the current SM is failing to deliver the Government's commitments. It was this trend that induced the Government to direct LPAs to continue using household growth projections from 2014 despite the availability of more up-to-date data. This was because the 2014 figures generated higher LHN figures and were more likely to deliver the Government's overall target.
- 3.18 Finally, the reliance on household growth projections in the 2018 SM methodology led to regional imbalances throughout the UK. In simple terms, London and the South-East received very high LHNs due to a lack of affordability and high household growth. Conversely, in the Midlands and the North the 2018 SM produced lower LHN figures and failed to boost the supply of new housing equitably across the country.

- 3.19 In response to the above issues (amongst other things) the Government published its “Planning For The Future” White Paper on 6 August 2020. Alongside this, Government also launched a separate consultation on changes to the planning system. The latter proposes a new version of the SM, which would yield 337,000 dwellings per year. The new SM seeks to address the short comings of the 2018 version by introducing various measures designed to distribute new homes more equitably throughout the UK.
- 3.20 If the new SM is applied to the West Midlands region the annual housing target increases from approximately 19,500 homes per year under the 2018 SM to approximately 27,500 homes. This increase, of 8,000 homes, in LHN would have to be delivered by all West Midlands authorities, including Solihull.
- 3.21 The new SM has received broad support from the housing industry. However, in November 2020, it was reported that Government was to revisit the changes to the standard method, following concerns expressed by some MPs about the outcomes of the formula which was subject to consultation in August. Whilst the outcomes of that further review remain to be seen, Government’s objective remains to encourage the delivery of sufficient housing to mitigate the ongoing housing crisis in the UK. The introduction of the new SM will render the LHN figures in the emerging Solihull Local Plan out-of-date immediately. SMBC will need to recalculate and then identify additional land to deliver its increased LHN.
- 3.22 Finally, the White Paper paves the way for an alternative approach to calculating LHN which would re-introduce a Government led, nationwide, distribution of the 300,000 home target based on need and constraints. On its face, this would be similar to the previous practice of identifying overall targets for each region and then tasking the individual LPA’s with delivering those targets. This third SM would remove the opportunity for LPA’s to assess how much housing they believe they can deliver based on the constraints of their boroughs and districts, including the Green Belt.
- 3.23 In summary, we conclude that the Council’s calculation of LHN, which is based on the 2018 SM, will soon be obsolete. Emerging Government policy suggests that Solihull’s LHN will increase, leading to a requirement to release more land from the Green Belt to be allocated to housing.

Unmet Needs

- 3.24 Section 33A of the Planning and Compulsory Purchase Act 2004 establishes a “Duty to Co-operate”. This is a legal test, as well as a test of soundness in the context of plan making, and is fundamental to the examination of the emerging Local Plan.

- 3.25 The Council considers the Duty to Co-operate in chapter 6 of its “Reg 19 Draft Local Plan: Overall Approach Topic Paper”. The chapter outlines how the Council has engaged in cross boundary growth issues and confirms that it has attended working groups comprised of representatives from the LPAs in the GBMHA.
- 3.26 The chapter cites “Position Statement Number 3 – September 2020” as evidence that unmet need within the housing market area (HMA) has reduced from 37,572 in 2015 to 2,595 in 2019. The shortfall identified in the position statement is based, in part, on undertakings and proposals made by the authorities in the HMA. These include SMBC’s undertaking to deliver approximately 2,000 homes towards unmet need in the HMA.
- 3.27 The position statement is a summary of the broad direction of travel rather than a definitive assessment of housing land supply based on commitments in adopted development plans. Accordingly, we conclude that it cannot be relied upon by SMBC to justify its very modest proposed contribution to the delivery of unmet need in the HMA.
- 3.28 There is no overarching, binding, agreement between the fourteen LPAs in the HMA which demonstrates robustly how Birmingham’s shortfall will be delivered. Nevertheless, some of the adjoining LPAs have, commendably, entered into memoranda of understanding (MOU) and similar binding agreements to demonstrate how they have committed to deliver cross boundary growth. Some LPAs have confirmed these agreements in their development plans and the issue has been important in the examination of those plans.
- 3.29 SMBC has no formalised arrangement with any of its neighbouring authorities, including Birmingham City Council (BCC). Birmingham adjoins Solihull Borough. Much of the urban area of Solihull is, in effect, a suburb of Birmingham.
- 3.30 BCC has stated that it will consider a review of its adopted Local Plan this year and will set out a timetable for its review by January 2022 if appropriate. This seems very likely given the impending change to the SM which is likely to increase housing need in the West Midlands by up to 30%.
- 3.31 In August 2020 the “Association of Black Country Authorities” wrote to all authorities within the HMA to identify significant challenges facing the Black Country Joint Plan Review. These challenges relate to the supply of housing and employment land. The Black Country Authorities have sought to maximise urban capacity and have committed to release significant amounts of land from the Green Belt. Nevertheless, the level of unmet need for housing is likely to be between 4,500 and 6,500 homes up to 2039.

- 3.32 We conclude that there is a current and future requirement for SMBC for deliver a significant number of new dwellings to address unmet needs in Birmingham and the wider HMA. This obligation is only likely to increase in the future as the new standard method is introduced and additional unmet needs in Birmingham and the Black Country filter through to the wider HMA.
- 3.33 SMBC's current approach to meeting unmet HMA needs is a commitment to test its ability to accommodate approximately 2,000 new dwellings over and above its LHN. The Council has not provided any evidence or rationale to justify either this approach or the figure chosen. This is despite numerous requests to do so. The decision to test the delivery of 2,000 homes has been taken autonomously and unilaterally, without any recourse to SMBC's neighbours, and in particular BCC.
- 3.34 We recognise that the 2020 Sustainability Appraisal, prepared by AECOM, includes the testing of 13 options (comprising of 6 main options, which are then further divided into sub-options). Those options vary from an outcome where only the Borough's needs are met (Option 1) to an outcome where the Plan makes provision for 25,000 new homes (Option 6) and a significant contribution to the shortfall arising in the HMA. Option 2 comprises an outcome whereby the needs of the Borough are met and a contribution of 2,000 dwellings is made to the HMA shortfall, although this is broken into three sub-options (2a, 2b and 2c), which test differing ways of delivering that level of growth. Options 3 to 6 then test progressively greater contributions towards the HMA shortfall, of 3,000, 6,000, 9,000 and 12,000 units respectively (and again each of these contains sub-options of different combinations for delivering those additional units).
- 3.35 In Options 3 to 6, the Appraisal tests the inclusion of 'amber sites', including the *"rounding of the Green Belt in sustainable locations such as... Widney Manor"* in addition to increasingly greater scales of development at Balsall Common.
- 3.36 At Paragraph 5.5.13, the Sustainability Appraisal concludes that, in respect of Option 3 (a contribution of 3,000 dwellings to the HMA shortfall),
- "the effects are very similar to the corresponding options under scenario 2. The additional 1000 dwellings involved should therefore be possible to accommodate without generating further significant effects that would not arise under scenario 2."*
- 3.37 The Appraisal goes on to say that, across Options 4, 5 and 6 (and the various combinations of the sub-options within them) there is potential both for greater significant positive effects and significant negative effects.

- 3.38 The Sustainability Appraisal is not, of course, a document that should set the strategy that SMBC incorporates into the Plan. However, it does form part of the evidence base that underpins the Plan, and it is apparent that it reaches a conclusion that SMBC could make a contribution of 3,000 dwellings to the shortfall in the HMA, without the impacts being materially more negative.
- 3.39 This further highlights, in our view, the absence of any published assessment undertaken by SMBC that tests whether it could make any greater contribution to the HMA shortfall, having regard to its suite of evidence base. It instead only illustrates that the decision to include a contribution of 2,000 dwellings seems entirely arbitrary.
- 3.40 We conclude that in order to robustly justify SMBC's approach towards meeting unmet need the Council should have sought agreement from its neighbours. Indeed, at Paragraph 148 of the Overall Approach Topic Paper, SMBC states that it is "*seeking*" to enter into a Statement of Common Ground with its HMA partners. That the Council has not done this before embarking on consultation of the Draft Submission Plan in accordance with Regulation 19 of the Local Plan Regulations, casts very serious doubt on the extent to which it can demonstrate that it has carried out constructive engagement with its partner authorities, and therefore demonstrate compliance with the duty to co-operate. Furthermore, the absence of a Statement of Common Ground to support the proposed approach at this stage of the plan-making process means that the Plan, in our view, is neither positively prepared nor justified.
- 3.41 In summary, we conclude that there is presently no justification for the arbitrarily selected figure of 2,000 dwellings to satisfy unmet need. We conclude that the Council should explain the process by which it has arrived at a conclusion that it could not deliver more than 2,000 dwellings towards the shortfall without unacceptable impacts on social economic or environmental interests.
- 3.42 At the very least, and without prejudice to our conclusions on the duty to co-operate, given that the Sustainability Appraisal provides significant weight to a conclusion that the Council could make a contribution of 3,000 dwellings towards the HMA shortfall with the impacts being largely the same as those which arise from the Council making a contribution of 2,000 dwellings, it appears to us that there is scope for the Council to make a contribution of at least 3,000 dwellings.

Green Belt and Safeguarded Land

- 3.43 SMBC has concluded that there are exceptional circumstances which justify the review of its Green Belt boundaries through the preparation of its emerging Local Plan. The main driver for this is housing need, which cannot be met without the release of Green Belt.

3.44 Paragraph 136 of NPPF states:

“...strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”.

3.45 Paragraph 139e) states that plans should;

“... be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;”

3.46 The Regulation 19 version of the emerging Local Plan proposes the release of sufficient land to accommodate Solihull’s LHN (calculated using the soon-to-be-replaced 2018 SM) and a modest amount of homes towards satisfying unmet need in the wider HMA. The previous incarnation of the Local Plan also only included land required to meet needs identified during the plan period.

3.47 We conclude that this approach is contrary to the provisions of the NPPF. In order to comply with the tests of soundness around being positively prepared and consistency with national policy, the emerging Local Plan should remove a significant amount of additional land from the Green Belt and simultaneously safeguard it for residential development at the appropriate time. Failure to do so will inevitably create the need to release more land from the Green Belt when the Local Plan is next reviewed. Paragraph 154 of the “Overall Approach” topic paper confirms that SMBC is likely to review its plan before 2031, as required by Government guidance.

Summary

3.48 We conclude that the LHN identified in the emerging Local Plan will shortly become obsolete due to the introduction of a revised SM. If introduced in the form proposed currently the new SM would increase LHN across the West Midlands by up to 30%.

3.49 SMBC does not have any formal arrangements or agreements in place with adjoining authorities in respect of meeting unmet housing needs in the HMA. Instead, the Council has arbitrarily and autonomously chosen to test its ability to accommodate 2,000 dwellings to meet unmet needs during the plan period. It has concluded that it is able to do so and has used this exercise to justify its proposed position.

3.50 The Council has not assessed whether it could deliver more dwellings and has not identified the number of dwellings above which unacceptable harm would be caused to social, environmental or economic interests.

- 3.51 We conclude that the Council has not discharged its duty to cooperate and that its contribution towards unmet needs is inadequate. This is especially the case given that SMBC has most of the West Midlands “Crown Jewel” employment generators including Jaguar Land Rover, the NEC and Birmingham Airport. Furthermore, only Birmingham City will gain more economic benefit from the arrival of HS2 than Solihull. Despite this, the Borough is proposing one of the smallest contributions towards meeting unmet needs of all of the HMA LPAs.
- 3.52 The emerging Local Plan fails to identify any “safeguarded” land on which to develop new housing in the future. This will inevitably mean that Green Belt boundaries will need to be altered again when the plan is next reviewed. This is contrary to the NPPF.
- 3.53 We conclude that the Plan (Policy P5 and the supporting text to it at Paragraphs 220 to 232) fails the test of soundness in respect of meeting housing needs and ensuring that Green Belt boundaries in the borough will remain beyond the proposed plan period.

4. Housing Land Supply

4.1 Paragraph 67 of the NPPF confirms that LPAs must identify a supply of:

- a) *“specific, deliverable sites for years one to five of the plan period; and*
- b) *specific, developable sites or broad locations for growth, for years 6 – 10 and, where possible, for years 11 – 15 of the plan.”*

4.2 The NPPF confirms that:-

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years”.

4.3 In respect of deliverability the NPPF establishes that sites which:

- do not involve major development and have planning permission; and
- all sites with detailed permission

should be considered deliverable until planning permission expires. The only exception to this is where clear evidence demonstrates that development is no longer viable.

4.4 In circumstances where a site:

- has outline planning permission for major development;
- is allocated in the development plan;
- has a grant of permission in principle; or
- is identified on a Brownfield Land Register (BLR)

the NPPF confirms that it should only be considered deliverable where there is clear evidence that it will deliver homes within 5 years.

4.5 To be developable (and included in the housing supply from year 6 onwards), the NPPF confirms that sites should *“be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.*

4.6 SMBC includes, at Page 69 of the Draft Submission Plan, a ‘Housing Land Supply Table’. The same table is also found on Page 13 of the ‘Meeting Housing Needs’ Topic Paper. This table sets out SMBC’s conclusions on its supply of sites over the proposed plan period.

- 4.7 A separate version of the supply table is also found on Page 70 of the Draft Submission Plan. This presents SMBC's conclusions on the extent to which the Council could demonstrate a five-year supply of deliverable sites at 1 April 2020 (the base date for the Plan). SMBC concludes that it could demonstrate a supply of deliverable sites of 5.37 years.
- 4.8 We have reviewed the Council's supply tables (for both the whole plan period and the first five years of the Plan). For reference, we have reproduced the 'whole plan period supply' table below.

Source	Capacity
1. Sites with planning permission (started)	1,663
2. Sites with planning permission (not started)	1,119
3. Sites identified in land availability assessment.	320
4. Sites identified in the Brownfield Land Register (BLR)	77
5. Town centre sites.	961
6. Solihull Local Plan (2013) Allocations Without Planning Permission at 1 April 2020	350
7. Less a 10% to sites with planning permission (not started) sites identified in land availability assessments, BLR and SLP sites	-283
8. Windfall Housing Land Supply (2022-2036)	2,800
9. UK central hub area to 2036	2,740
10. Allocated sites to 2036	5,270
Total Estimated Capacity (rows 1-10)	15,017

- 4.9 We note that the Draft Submission Plan includes a housing trajectory, which divides sites into three phases. However, two of the phases are combined by SMBC for the purposes of establishing annual housing requirements and charting the proposed housing trajectory. The phases cover the following time periods:-

- Phase I – 2020 to 2026; and

- Phase II/III – 2026 to 2036

4.10 The Council anticipates a slower rate of delivery during Phase I (851 dwellings per annum) rising to 991 homes per annum during the Phases II and III. No evidence is provided to explain why the proposed allocations have been placed into their respective phases and this is examined in more detail in subsequent sections.

4.11 Our comments on the Housing Supply Table are set out as follows.

Sites with Planning Permission (Started)

4.12 We note that this figure is drawn from Appendices G and H of the Draft Strategic Housing and Economic Land Availability Assessment (SHELAA), prepared by SMBC in 2020.

Sites with Planning Permission (Not Started)

4.13 Row 2 of SMBC's supply table shows 1,119 dwellings in this category, of which 889 dwellings are to be delivered within the first five years of the Plan and therefore contribute to SMBC's five-year supply. The Council's evidence base indicates that the difference of 230 dwellings can be accounted for by one single site: The Green on Stratford Road, which is reported to benefit from an outline planning permission for 330 dwellings, but which SMBC says could contribute 100 dwellings in the first five years of the Plan.

4.14 The 2020 Draft SHELAA provides, at Appendices A and B, a schedule of planning permissions which are described as "*live*". We assume this means 'extant but not implemented' and that this is where the figure for row 2 of the supply table is drawn from. We say this on the basis that: a) the total number of dwellings listed in the two appendices is 1,119; and b) because the appendices to the SHELAA can all be matched against the remaining lines of the supply table.

4.15 Upon reviewing the appendices, we have noted, firstly, that it includes a site at 27 Lowbrook Lane. SMBC's records show that, although the Council granted planning permission in 2017, this was quashed in the High Court later that year. Once the application was remitted to SMBC, the Council then decided to refuse the application in 2019. This site cannot therefore be included in the supply table.

4.16 Secondly, this row of the supply table includes a number of planning permissions that were granted during 2017. We have briefly checked SMBC's planning records for each site, and have noted that the planning permissions were required to be implemented within three years of the date of the permission being granted (and so during the course of 2020). Indeed, a number of those permissions were required to be implemented before the SHELAA was published in October of this year. On the

basis that the Council has included those sites in the 'not started' category, we can only conclude that the Council holds no evidence of the consents being implemented. In the absence of such evidence, we can only conclude that those planning permissions have now lapsed (or will lapse between the time of writing and the end of 2020). That being so, those sites would not be capable of delivering housing during the Plan period, and so should be excluded from the supply table.

- 4.17 Our analysis suggests that 44 dwellings can be discounted from row 2 of the supply table on this basis. The SHELAA indicates that a number of other sites in this category will lapse during the early parts of 2021, so that by the time the Plan may be adopted, the number of dwellings in row 2 of the supply table is likely to have decreased further.
- 4.18 These points are likely to have implications for SMBC's ability to demonstrate a five-year supply of housing when the Plan is adopted. We say this as all but one of the sites in this category of supply are expected by SMBC to be delivered in the first five years of the Plan (and therefore contribute to five-year supply). We return to consider this in later paragraphs.

Sites Identified in Land Availability Assessments

- 4.19 Appendix E of the SHELAA shows that sites identified as being suitable for residential development in the SHELAA could contribute 320 dwellings to the supply of housing up to 2036. Of that number, the SHELAA concludes that 100 dwellings are deliverable and therefore will contribute to the Council's five-year supply. This contradicts the five-year supply table in the Draft Submission Plan, which states that 200 dwellings will be delivered on sites identified in land availability assessments.
- 4.20 In any event, none of the sites in this category are allocated for development, and are not: a) allocated in the 2013 Local Plan; or b) proposed for allocation in the Local Plan Review. The Council has not provided any evidence to demonstrate how the 100 dwellings from SHELAA sites that it says are deliverable would satisfy the definition of deliverable in the NPPF. At the very least, those units should not contribute to the supply of housing in the first five years of the Plan.
- 4.21 More significantly, though, in the absence of being allocated, or benefitting from planning permission, we conclude that all of the sites in this category (i.e. not just those which SMBC says are deliverable) would be more appropriately be categorised as windfalls.
- 4.22 The above casts doubt on the robustness of the Council's estimate of delivery from windfalls and suggests that sites may have been double counted, i.e. they appear in rows 3 and 9 of the supply table.

4.23 Accordingly, we conclude that the Council has not provided sufficient evidence to justify the inclusion of these sites in row 3 of the supply table. Row 3 should be deleted completely as a consequence.

Sites Identified in the Brownfield Land Register

4.24 The table indicates that 77 dwellings will come forward from the Brownfield Land Register (BLR), all in the first five years of the Plan. As with sites in row 3 of the supply table, we are concerned that the BLR sites should either be:

- i) identified as allocations with evidence to support the Council's conclusion that they will contribute to supply; or
- ii) categorised as windfalls.

4.25 There is a very significant difference between the Council's claimed windfall supply (2,800 dwellings) and the contribution from the BLR (77 dwellings). This is despite the fact that the two sources of supply should, arguably, be broadly the same. The PPG confirms that windfall sites should be considered for inclusion in the Brownfield Land Register and that where windfall sites are deliverable they count towards 5 year land supply.

4.26 Given the lack of evidence to demonstrate that these sites meet the NPPF definition of deliverable, and support the inclusion of BLR sites in the supply table, we conclude that the row should be removed from the supply calculation.

Town Centre Sites

4.27 Neither the Draft Submission Plan, nor the Meeting Housing Needs Topic Paper include details of the sites that will deliver the 961 units within the town centres. The only clarification provided is that Solihull Town Centre will deliver 861 units and Chelmsley Wood Town Centre will deliver 100 units.

4.28 The 2020 SHELAA advises that the Solihull Town Centre sites are carried over from the 2013 Local Plan. We note that the 2013 Local Plan identified a capacity for 950 dwellings to be delivered on sites in the Town Centre. Paragraphs 113 to 131 of the Draft Submission Plan advise that, in 2016, an Illustrative Town Centre Masterplan was prepared (and which informed the Draft Local Plan that was published for consultation in 2016). The Masterplan identified capacity for 1,500 dwellings to be constructed in the Town Centre, of which the Draft Local Plan concluded that 861 could be delivered over the forthcoming plan period.

4.29 SMBC now reports that updated market reviews and analyses have been procured from Amion, in order for the Council to reach a refined view on those sites in the Town Centre which can be

developed over the forthcoming plan period, and the capacity of each of those opportunities. SMBC states at Paragraph 130 of the Draft Submission Plan that although the outcomes of that assessment are not yet available, the work has indicated that the, *"level of residential development that can be accommodated in the town centre is expected to at least match that assumed in the Draft Local Plan, if not exceed it."* SMBC goes on to say that, once the Amion work has been completed, it will update its figures on Town Centre capacity. In the meantime, SMBC states that it is relying on the figure of 861 dwellings that emerged from the 2016 Draft Local Plan.

4.30 Given that SMBC is currently consulting on the Draft Submission Plan (which is the version it intends to submit to the Secretary of State), it is unacceptable that the evidence around Town Centre opportunities and capacity is not available for interested parties to comment on at this stage. Those with interests in the Plan must have the opportunity to review and test SMBC's evidence as part of the current consultation, in order to reach a view on the acceptability of the Council's conclusions on the number of dwellings that can be delivered in the Town Centre over the plan period.

4.31 Beyond this, the 100 units which are said to be capable of being delivered in Chelmsley Wood Town Centre are reported to have emerged from the SHELAA (rather than being allocated or benefitting from planning permission). However, SMBC's re-issued Site Assessment document, dated November 2020, states that the Chelmsley Wood Town Centre sites were excluded from the SHELAA. It is therefore not at all clear from the Council's evidence base what testing has been undertaken of the potential to deliver 100 units in the Town Centre, and to justify inclusion of these dwellings in the supply calculation. In any event, we reach the same conclusions as we have in respect of other sites that are neither allocated nor the beneficiary of a planning permission; they are windfalls and so are already captured by row 8 of the supply table. On this basis, and to avoid double counting, these units must be excluded from row 5 of the supply table.

Solihull Local Plan (2013) Allocations without Planning Permission at 1 April 2020

4.32 Appendix C of the 2020 SHELAA lists those sites which are to be carried forward from the 2013 Local Plan. These are:-

- i) the Simon Digby site in Chelmsley Wood, which is identified as capable of delivering 175 dwellings (in the first five years of the Plan);
- ii) land at Riddings Hill, Balsall Common, which is identified as capable of delivering 65 dwellings (in the first five years of the Plan); and
- iii) land off Meriden Road in Hampton-in-Arden, which is identified as capable of delivering 110 dwellings (in the first five years of the Plan).

- 4.33 Like the Draft Submission Plan, the 2013 Local Plan categorised the housing sites within it into phases. The Simon Digby site fell within the first phase of the 2013 Local Plan, and so was expected to be delivered between 2013 and 2018. That it has not come forward for development raises questions about its deliverability. However, SMBC has not commented on that in its evidence base. Indeed, the only reference to deliverability that we have found is in the SHELAA, where SMBC note that the site has been subject to pre-application discussions (with those relating to a scheme of 175 dwellings). However, the submission of a pre-application enquiry is no guarantee that a planning application (or permission) will follow, and so we think this falls substantially short of providing clear evidence that the site is capable of being delivered for housing, whether that is in the first five years of the Plan or in year 6 and beyond. We therefore conclude that SMBC has not justified the carrying over of this allocation, and that it should be excluded from the supply table.
- 4.34 The site at Riddings Hill, Balsall Common, was allocated to Phase II of the 2013 Local Plan (where SMBC expected development to be delivered between 2018 and 2023). It does not appear that the site has been subject to any additional assessment as part of the preparation of the Local Plan Review. It is incumbent on SMBC to provide the clear evidence that the site is deliverable, in order for it to contribute to the supply of housing in the first five years of the Plan. The NPPF is clear that it is not permissible for LPAs to simply rely on a site being allocated to demonstrate that it is deliverable. Therefore, in the absence of such evidence, we conclude that SMBC has not justified the retention of this site in the supply table, and that it should be excluded.
- 4.35 The site at Meriden Road, Hampton-in-Arden, appears to comprise agricultural land, and was located adjacent to a former ammunition depot. The 2013 Local Plan stated that delivery of the allocation was contingent upon “reclaiming the ammunition depot” for open space. It is not at all clear whether the rolling forward of the allocation into the Local Plan Review carries the same contingency. If so, SMBC must demonstrate within its evidence base that it is satisfied that the depot can be provided as open space, to facilitate development on the existing allocation.
- 4.36 We raise this because SMBC’s Site Assessment (November 2020) includes an assessment of the depot, which concludes that the site may be suitable for residential development. That would, on its face, appear to challenge the ability of the depot to provide the open space that would then unlock development potential of the adjoining, existing allocation. The absence of any evidence or discussion around these matters in the Draft Submission Plan means that SMBC has failed to demonstrate, robustly, that the Meriden Road allocation is capable of delivering new housing during the forthcoming plan period. We therefore conclude that it too must be excluded from the supply table.

Less 10% to Sites with Planning Permission (Not Started), Sites Identified in Land Availability Assessments, Brownfield Land Register Sites and Solihull Local Plan (2013) Sites

4.37 The Council has not provided evidence to demonstrate why a 10% discount is appropriate as opposed to a higher figure. The discount is applied to sites identified in Land Availability Assessments, and on the Brownfield Register, which we consider should be excluded from the supply calculations on the basis that, if not allocations, they are windfalls. We reserve the right to comment on this in more detail once the evidence to support this assumption is made available.

Windfall Housing Land Supply

4.38 The Council is obliged to release land from the Green Belt to meet its LHR and unmet need from the HMA. It should also be releasing land from the Green Belt and identifying it as safeguarded to meet housing needs beyond the plan period, as required by the NPPF. In doing so the Council must be able to demonstrate that it has maximised opportunities to deliver dwellings on sites within the urban area and on land outside the Green Belt (albeit there is no such land in Solihull).

4.39 SMBC has, since the first introduction of housing land supply figures, maintained that a significant element of its supply comes from windfalls. The Inspector who examined the Solihull Local Plan, Mr Stephen Pratt, was persuaded to accept a windfall allowance of 150 dwellings per annum.

4.40 However, on the basis that SMBC is proposing to release land from the Green Belt as part of the Plan, it must have satisfied itself that it has exhausted capacity within the urban areas. That must cast doubt on the number of genuine windfall opportunities that may come forward over the plan period. We have already observed that sites emerging from the SHELAA or which are included on the Brownfield Register are windfalls (and which the Council is aware of). These total 397 dwellings, meaning that for the Council's windfall allowance to be met, a further 2,403 windfall dwellings would need to come forward by 2036.

4.41 Moreover, 2,800 dwellings makes up c. 18.6%, or nearly a fifth, of the supply of housing shown in the Draft Submission Plan

4.42 In an area where non-Green-Belt opportunities have been exhausted (leading to the release of land from the Green Belt), it is contradictory for SMBC to assume that nearly a fifth of the supply will be delivered through windfalls. Further evidence-based justification is required from the Council to support such a high reliance on windfall sites, as this has a very significant bearing on the quantum of land required to deliver new homes and for the setting of appropriate Green Belt boundaries to ensure that they endure well beyond the plan period.

UK Central Hub Area

- 4.43 The ability of the UK Central Hub Area to contribute to major growth in the Borough is not questioned. The Council increased its assumptions on the delivery of housing from UK Central Hub from 1,000 dwellings in the 2016 Local Plan Review Consultation to 2,500 in the 2019 Supplementary Consultation. Our representations at that time challenged the expectation that such a volume of dwellings could be delivered over the proposed plan period.
- 4.44 Notwithstanding that, SMBC states in the Draft Submission Plan that the UK Central Hub can deliver 2,740 homes by 2036.
- 4.45 It remains the case that we do not challenge the contribution that the UK Central Hub can make to growth in the Borough. We cannot, though, locate any evidence to support the Council's view that 2,740 dwellings will be delivered by 2036 (it is not, for example, a figure that features in the UK Central Framework Plan).
- 4.46 In the absence of such evidence, we think that SMBC is being overly optimistic in assuming 2,740 dwellings will be delivered by the end of the plan period. It would, for example, require the hub area to deliver over 182 dwellings per annum, beginning in 2021, for that amount of housing to be delivered by 2036. However, UK Central does not feature in the five-year supply table on Page 70 of the Draft Submission Plan, which suggests that SMBC does not expect it to begin delivering until 2026 at the earliest. If that were right, then it means the Council expects the site to deliver nearly 275 dwellings per annum over 10 years. If that is the Council's position, then it needs to evidence this.
- 4.47 In reality, before the site can begin to deliver, it must firstly be released from the Green Belt (which will take place upon adoption of the Plan), and then outline planning permission must be granted. Approvals of reserved matters would subsequently need to be obtained, before pre-commencement conditions are discharged and any other technical approvals secured.
- 4.48 As we noted in our representations to the Supplementary Consultation, Avison Young has undertaken research into the delivery rates of large complex sites, such as UK Central. That has indicated that such sites may have a lead-in time of some 7 years (before the first dwelling is delivered). That being so, we maintain, as we did in 2019, that a more prudent assumption may be that the scheme begins to deliver in 2028, and that it may deliver, say, 800 dwellings by 2036 (at a rate of 100 dwellings per annum).

Summary and Implications for the Supply of Housing

4.49 Our analysis of the land supply assumptions included in the Draft Submission Plan leads us to conclude that supply has been over-estimated for the following reasons.

- Double counting, arising from several sources of supply (windfalls, BLR, sites identified in availability assessments and town centre sites) which are, on the face of it, the same, without evidence do demonstrate why the sites fall into only one category and not several.
- Lack of evidence to demonstrate why allocated sites in the adopted Local Plan will deliver units in the new plan period but have not done so for over seven years.
- Lack of evidence to demonstrate why a 10% discount figure has been applied and not a higher figure
- Over estimation of delivery from windfall sites, in particular given the NPPF requirement to maximise urban land before altering Green Belt boundaries.
- Over reliance on early delivery from the UK Central Hub Area, combined with a lack of evidence to demonstrate how the very significant infrastructure requirements needed to facilitate housing development will be delivered.

4.50 Having regard to these matters, we produce below a revised version of the plan period supply table, adjusted to take account of the amendments and exclusions that we have said must be made.

Source	Capacity
1. Sites with planning permission (started)	1,663
2. Sites with planning permission (not started)	1,075
3. Town centre sites.	861
4. Less a 10% to sites with planning permission (not started) sites identified in land availability assessments, BLR and SLP sites	-108
5. Windfall Housing Land Supply (2022-2036)	2,800
6. UK central hub area to 2036	800

7. Allocated sites to 2036	5,270
Total Estimated Capacity (rows 1-7)	12,361

- 4.51 It is apparent that from the above that, if the supply is adjusted to remedy the issues that we have identified, then the Council is only to demonstrate that a supply of 12,361 dwellings over the plan period. That is some 551 dwellings short of the identified housing need for the Borough of 12,912 dwellings and would mean that SMBC could not meet its own needs, nor make any contribution to unmet needs arising from Birmingham.
- 4.52 Crucially, that figure includes a windfall figure of 2,800 dwellings, which we have said cannot be relied upon, and retains a 10% non-implementation discount applied to sites with planning permission that are not started (even, though, as we have noted, SMBC has not explained why that figure should not be greater). If the supply figures were further adjusted, to show fewer windfall dwellings and / or a greater non-implementation discount, then the outcome would be that the deficiency would be exacerbated.
- 4.53 It is for this reason that we conclude that the Plan (Policy P5 and its supporting text at Paragraphs 220 to 232), as drafted, is not positively prepared, because, on a proper assessment of housing supply, it does not meet the housing needs of the Borough.
- 4.54 A supplementary point is that our judgements around the Council's supply figures would also have implications for the calculation of five-year supply upon adoption of the Plan. To that end, we have reproduced below the Council's five-year supply table from Page 70 of the Draft Submission Plan, and have adjusted it to take account of our comments in this Section.

Source	Capacity
1. Sites with planning permission (started)	1,663
2. Sites with planning permission (not started)	745 ¹
3. Less a 10% to sites with planning permission (not started) sites identified in land availability assessments, BLR and SLP sites	-75
4. Windfall Housing Land Supply	600

5. Allocated sites	1170
Total Estimated Capacity (rows 1-5)	4,103
Annualised Requirement	851
Annualised Requirement + 5%	894
Five-year requirement	4,468
Five-year supply	4.59 years

- 4.55 The above table indicates that, adopting appropriate assumptions and judgements around the Council's housing supply, SMBC will not be able to adopt a five-year supply of housing on adoption of the Plan. Consequently, the Plan will not be consistent with national policy.
- 4.56 These deficiencies in supply could be remedied through the Council revisiting its supply of sites and identifying additional land for allocation. As we shall explain in subsequent Sections, our Client's interests provide a suitable location for housing, that could make a meaningful contribution to the delivery of new dwellings in the Borough.

5. Site Selection Process and Assessment of Site 111

- 5.1 In the preceding Section, we have explained why we think that SMBC has not correctly identified a supply of deliverable or developable housing land that would meet the Borough's needs (or make a contribution to meeting unmet need from elsewhere in the HMA). We have said that in order to remedy that deficiency, the Council should revisit the pool of sites that have been submitted to it during the preparation of the Plan and identify additional sites for allocation. With that in mind, it is important to examine the way in which the Council has assessed our Client's interests at Widney Manor Road.
- 5.2 When SMBC carried out its 'Supplementary Consultation' between January and March 2019, our Client's land was identified in the supporting evidence as a 'Red Site' and which was not to be proposed for allocation in the Plan. We made representations on behalf of SKE at the time. Those representations considered, amongst other things, the approach that had been adopted by SMBC to site selection, and explained why the Council had, in our view, erroneously reached a conclusion that our Client's site should be categorised as 'red'.
- 5.3 It remains the case that our Client's land is not proposed for allocation in the Draft Submission version of the Plan. We have reviewed the 'Site Selection Process' Topic Paper that has been prepared by SMBC; this identifies the evidence base that the Council has relied upon in determining which sites should be allocated, and then explains the methodology that the Council has applied in assessing its pool of sites. The Topic Paper confirms that the methodology comprises of a two-step approach. This is generally consistent with the approach that SMBC relied upon to support the Supplementary Consultation in 2019, but the process generates either 'green' or 'red' sites, and does not include the 'amber' sites that formed part of the 2019 methodology. SMBC explains in its Topic Paper that the 'amber' category was a mechanism by which certain sites could be more carefully assessed as part of the Supplementary Consultation. For the purposes of the Draft Submission Plan, the Council has identified those sites which it considers suitable ('green') and those which are not to be included in the Plan ('red').
- 5.4 In our representations to the Supplementary Consultation, we expressed concern on behalf of our Client that there was no clarity of explanation of how the two-step site assessment was to be applied, and whether, for example, any weighting was given to particular factors (for example, were the outcomes of, say, the SHELAA seen as more important, and therefore weighted accordingly, than the outcomes of the Accessibility Study?)

- 5.5 Upon review of the Site Assessment Topic Paper, we note that SMBC provides no clarification on these matters. It therefore remains the case that there is an absence of transparency in the Council's approach to site selection.
- 5.6 Some of the evidence base that SMBC has relied upon in carrying out its site assessments (such as the Green Belt Assessment) remains as it was when the Council carried out its Draft Local Plan and Supplementary Consultation exercises. Other pieces of evidence have been updated.
- 5.7 Notwithstanding our views on the lack of clarity regarding the methodology relied upon by SMBC, we have reviewed the evidence base and the site assessment for our Client's land at Widney Manor Road. We note that the outcome of 'Step 1' of the site assessment is that the site scores 9, and then it scores as 'red' in 'Step 2'. However, as we stated in our representations to the Supplementary Consultation in 2019, we are concerned that: i) some elements of the evidence base reach incorrect, or inconsistent, conclusions in respect of Site 111; and ii) that, as a consequence of i), SMBC has applied incorrect judgements when assessing our Client's site.
- 5.8 In the following paragraphs, we therefore comment on the conclusions reached in the evidence base and explain where the analysis is incorrect. We go on to explain that, had it not been for those points, Site 111 is then capable of being assessed more positively by SMBC through the two-step approach. To support this analysis, we have included, at **Appendix II**, the Vision Document prepared in 2017, and which has informed previous representations that we have made to-date in respect of Site 111.

Step 1

- 5.9 As was the case in the Supplementary Consultation, Step 1 of the assessment comprises the scoring of sites against a hierarchy. As we have noted above, SMBC has scored the site as '9' in the Step 1 process. The Topic Paper advises that sites in this category are "*greenfield in isolated / moderately performing Green Belt*". We explained in our representations to Supplementary Consultation why the site is neither isolated, nor in a moderately performing Green Belt location. We think it appropriate to set those points out again here, principally because the Accessibility Study, prepared by Atkins and which forms part of the Council's evidence base, has been updated to inform the Draft Submission version of the Plan.

Isolation

- 5.10 We disagree firstly that the site is isolated. To be 'isolated', a site must have no relationship with the existing urban area. That is not the case here. The site is bound to the west by Widney Manor Road and the dense urban area which lies beyond. On its northern side, it is bound by existing built development on Lovelace Avenue. To emphasise the point, we draw attention to the conclusion reached by PBA in

the SHELAA in 2016. In assessing the suitability of the site, PBA ascribed the highest possible score in terms of suitability of location, saying that it “*within or adjacent to a settlement within the Major Urban Area*”. We therefore maintain that the site is not isolated.

Accessibility

- 5.11 The 2020 site assessment proforma gives an overall score of “*medium*” for the site in respect of accessibility. This appears to be derived from the 2020 Accessibility Study prepared by Atkins.
- 5.12 We have reviewed the scoring of the site undertaken by Atkins. The site has been given a total accessibility score of 220, which is comprised of the following component scores.

Facility / Provision	Score
Primary School	60
GP Surgery	25
Foodstore	35
Bus Stop	60
Railway Station	100
Total	220

- 5.13 We agree that the site should score 100 for accessibility to a railway station, on the basis that it is within 800m walking distance of Widney Manor station, which is served by at least 3 services per hour in either direction. However, we are unsure why a score of 60 has been ascribed for bus access, given that Figure 1D confirms that the site is within a 400m walking distance of a bus stop served by a route with a daytime frequency of 15 minutes or better (that bus stop being located at the railway station and served by National Express route 5, which operates frequently between Birmingham and Solihull). We conclude that a score of 100 should also have been applied for bus accessibility.
- 5.14 We recognise that, as Atkins have only taken the higher of the two scores when calculating public transport accessibility, that would have made no difference to the overall score. However, it does illustrate, qualitatively, that the site is highly accessible by public transport.

- 5.15 In addition, it is not clear why differing scores have been applied for accessibility to a foodstore and GP surgery. The nearest foodstore, based on our research, is the Co-Operative Supermarket at Farmhouse Way in Monkspath. The nearest GP surgery to the site, from our research, is Monkspath Surgery, which is also located at Farmhouse Way, opposite the Co-Operative supermarket. We therefore conclude that the site should have scored equally in respect of accessibility to a foodstore and GP surgery. Because Atkins say that, for facilities beyond 1,200m walking distance, sites will be scored relative to each other, it is not clear from the evidence how the scores of 25 and 35 for these facilities have been calculated, and this must be clarified.
- 5.16 More significantly, however, the scores assigned in respect of accessibility to these facilities are based only on journeys undertaken by foot. What the Study does not do is examine whether there are opportunities to carry out these journeys by bicycle or public transport. Had the Study done this, it would have concluded that the aforementioned facilities at Monkspath are both located very close to bus stops served by bus route 5, which as we have already noted, operates frequently from Widney Manor Railway Station. Furthermore, as bus route 5 calls at Solihull Town Centre, convenience retail facilities there (Aldi and Waitrose at Homer Road) are both highly accessible by bus. They could, equally, be readily accessed by train, having regard to the frequency of services between Widney Manor and Solihull stations.
- 5.17 Further still, the Monkspath facilities are approximately 1,900m travelling distance from the site (taken from the access point relied upon by Atkins) and the foodstores at Homer Road are approximately 2,000m travelling distance from the site. In our view, those distances are both readily achievable by bicycle.
- 5.18 A further point is that focussing on accessibility of foodstores by walking is, in our view, an arbitrary approach. Customers are only likely to carry a limited amount of shopping if travelling on foot, compared to the amount they may be willing to carry if travelling by bus, train, or bicycle.
- 5.19 For all of these reasons, we consider that focussing only on walking distances has resulted in an unjustifiably negative assessment of the accessibility of local facilities from our Client's site. As we have demonstrated, three foodstores, and a GP surgery, are readily accessible by means other than the private car, and given the distances from the site to those facilities, journeys by rail / bus or bicycle would not take very long to complete. We conclude that SMBC should have applied this additional level of qualitative judgement when assessing accessibility.
- 5.20 Had it done so, then SMBC should have concluded that the site benefits from good accessibility.

- 5.21 That being so, then this would have been sufficient to classify the site as an accessible location in moderately-performing Green Belt, and which would have led to the site scoring, at least, a 6 in Step 1 (and therefore being classified as a blue site).
- 5.22 However, even that would represent an incorrect score for the site. We say this on the basis that, as we explain in the following paragraphs, the site is in a low-performing Green Belt parcel, and not a moderately-performing parcel as stated in the Council's Green Belt Assessment).

Green Belt

- 5.23 The GBA methodology adopted by its authors, Atkins, sought to assess the existing Green Belt across two distinct categories:-
- a) broad areas; and
 - b) refined parcels.
- 5.24 Atkins assessed land within each category against four of the five purposes of the Green Belt that are established in the NPPF. Those purposes are:-
- i) to check the unrestricted sprawl of large built-up areas;
 - ii) to prevent neighbouring towns merging into one another;
 - iii) to assist in safeguarding the countryside from encroachment; and
 - iv) to preserve the setting and special character of historic towns.
- 5.25 Atkins scored land in each area based upon the extent to which it performed against each purpose. A score of 0 meant it did not perform against the purpose and a score of 3 meant it performed highly against the purpose.
- 5.26 SKE's land at Widney Manor Road falls within refined parcel RP32, which is identified as 'Land to the west of M42 at Brueton Park'.
- 5.27 Land parcel RP32 achieves an overall score of 6. It scored 1 against purposes i) and iii) and 2 against purposes ii) and iv). In other words, the parcel performs no more than moderately against any of the purposes. Indeed, Atkins concludes that the parcel is low performing in checking the unrestricted sprawl of the built-up area and in safeguarding the countryside from encroachment.

5.28 In our view, this indicates that the parcel does not make significant contributions to the purposes. However, we conclude that it is expedient to refine this analysis further with reference specifically to SKE's land, rather than the wider 'refined parcel' in which it is located.

Purpose i)

5.29 The site is bounded by a small parcel of land on Lovelace Avenue to the north, field boundaries formed by hedgerows to the east and south, and Widney Manor Road to the west.

5.30 Furthermore, the River Blythe and M42 are located a short distance beyond the southern boundary, while the urban area of Solihull falls beyond the western boundary. We conclude the form of the existing site boundaries, and the features immediately beyond them, would represent strong defensible boundaries that would prevent unrestricted sprawl. We therefore conclude that, at a site-specific level, very little contribution is made to purpose i) and so a score of 0 (based on Atkins' assessment) would be appropriate.

Purpose ii)

5.31 As we have described above, there is a strong defensible boundary formed by the existing field hedge and there are physical boundaries to the south of the site provided by the River Blythe and M42. These features would enable a significant buffer to be maintained between the site and the urban area of Bentley Heath on the south-eastern side of the M42. As a consequence, we conclude that the urban edge of Solihull would remain separated from Bentley Heath and Dorridge. Accordingly, the site makes very little contribution to purpose ii) and so a score of 0 can be ascribed to it.

Purpose iii)

5.32 As above, the strong defensible boundaries to the site would ensure that development is contained. Built form on the site would not extend any further south than the existing ribbon development on the western side of Widney Manor Road, and would extend in much less of an easterly direction than the ribbon development on Lovelace Avenue.

5.33 As such, while development would result in the extension of the urban area into the countryside, having regard to existing patterns of development, the site would represent a neat 'infill' which would round off the urban edge. We do not think that this is sufficient for the site to score 0 against purpose iii), but a score of 1, consistent with wider parcel RP32, is appropriate.

Purpose iv)

- 5.34 The site is located on the urban edge of the Solihull urban area. There are no historic towns in proximity to it. We therefore conclude that it does not contribute to preserving the setting and special character of such towns. Accordingly, in our view the site should score 0 against this purpose.

Green Belt Assessment Summary

- 5.35 On this basis of the above, we conclude that, if the site is assessed in isolation, rather than as a much larger parcel (which is of too broad a scale to reach granular level conclusions and judgements), then an overall score of 1 is applicable to the site. That being so, then it indicates that the site, on its own, makes very little contribution to the purposes of the Green Belt, and is therefore a low-performing Green Belt site.

Implications for Step 1 Analysis

- 5.36 The corollary of all of the above is that, if properly assessed, the site occupies an accessible location in a low-performing area of Green Belt. That means that the site should have scored 5 and therefore been classed as a yellow site, or, as noted in the Topic Paper, a 'potential allocation'. This should then have formed the starting point for an analysis of the site under the Stage 2 methodology.
- 5.37 Having reached that conclusion, we comment on the matters of planning judgement, which have been applied by SMBC in Step 2 of the assessment.

Step 2

- 5.38 The site assessment proforma prepared by SMBC makes reference to: i) the categorisation of the site in the SHELAA; ii) landscape value and sensitivity; and iii) the outcomes of the sustainability appraisal undertaken by AECOM. We consider each of these in turn.

SHELAA 2016

- 5.39 PBA placed the site in Category 3. In doing so, it said that Site 111 "*performs well*" against both availability and achievability criteria. However, PBA said that the site "*faces significant suitability constraints*", a conclusion which is repeated on SMBC's site assessment summary.
- 5.40 PBA reached that conclusion despite scoring the site in the following way (where 5 is the top (best) score and 0 is the lowest (worst) score).

Criterion	Score
Access	5
Contaminated land	5
Ground conditions	5
Heritage	5
BMV	4
High pressure gas mains	0
Flood risk	2
Bad neighbour	5
Biodiversity	5
Suitability of location	5

- 5.41 As can be seen, PBA generally scored the site quite positively. It appears that the conclusion on suitability constraints is a product of the low scores for the gas mains and flood risk (that must be so, given that the site scores 5 in all other regards, save for BMV, where it still scores 4).
- 5.42 In relation to **flood risk**, PBA scored the site 2 on the basis that, in its view, between 10 and 25% of the site is located in Flood Zone 3. That assertion is repeated in the Site Assessment proforma prepared by SMBC. However, as confirmed in the Vision Document which has been prepared in support of our Client's site, and as can be seen from a review of the latest Environment Agency Flood Maps (see extract at **Appendix III**), that is incorrect. None of the site is in Flood Zone 3. A small area of 0.13 ha (equating to 3% of the site area) is located in Flood Zone 2. The remainder is entirely in Flood Zone 1. Therefore, PBA scored the site incorrectly. Given that the Vision Document confirms that flood risk is not a constraint to development, we conclude that PBA should have scored it as a 5.
- 5.43 In relation to the **gas mains**, our Client has, since 2017, continued to work with Cadent (which has statutory responsibility for the gas mains) and with HSE, to explore whether it may be possible to build

to within 15m of the centre line of the pipe. In doing so, our Client commissioned a feasibility report from Andrew Francis and Associates (AFAA), on the recommendation of Cadent, to test the feasibility of building to within 15m of the centre of the pipe, without significant safety risks arising. The AFAA report considered, amongst other things, the construction and condition of the pipe, and the nature of risk-sensitive receptors, and concluded that development to within 15m of the centre line would not pose any adverse risks to human safety. Those conclusions were accepted by Cadent.

- 5.44 Our Client subsequently submitted a pre-application enquiry to the HSE. This was accompanied by the AFAA report and a Parameters Plan showing residential development up to 15m from the centre line of the pipe (and so beyond the 36m stand-off that HSE normally imposes for residential development). The HSE, having considered the information provide, subsequently confirmed that it would not advise against the grant of planning permission were residential development proposed up to 15m from the centre of the piper. The HSE response is at **Appendix IV**. The revised Parameters Plan, which shows development of 79 dwellings, is at **Appendix V**.
- 5.45 The consequence of this is that, contrary to the conclusions reached by PBA, the gas mains is not a constraint to development, and, as shown on the revised Parameters Plan, the site is capable of accommodating 79 dwellings. Therefore, we conclude that the site should have been scored as 5 by PBA. That being so, then the correct scoring in the SHELAA should have been as per the table on the following page.

Criterion	Score
Access	5
Contaminated land	5
Ground conditions	5
Heritage	5
BMV	4
High pressure gas mains	5
Flood risk	5
Bad neighbour	5
Biodiversity	5
Suitability of location	5

5.46 Had PBA scored the site in this way, then a logical conclusion is that it would not have placed the site in Category 3. It would have found the site to be suitable and, as it has done, available and achievable. A logical conclusion flowing from that is that the site should have been placed into Category 1 by PBA.

Landscape Value and Sensitivity

5.47 Another factor raised by the Council is that the site has medium visual sensitivity and that is in a landscape area that has low capacity to change.

5.48 The Vision Document prepared in support of our Client's site explains that, firstly, *"the site is only glimpsed in places when travelling in a southerly direction from Solihull"* and that *"the substantial boundary landscaping provides an effective screen of the site from... the western side of Widney Manor Road"*. Moreover, the Vision Document says that although the site can be seen in *"middle distance views"* from the southern side of the M42, it is seen *"in the context of substantial landscaping both along the boundaries of the site and on land between the site and the motorway"*.

5.49 All of that being so, then we conclude that the site has better than medium visual sensitivity and that, moreover, the landscape has capacity to accept the change that would arise as a consequence of

building houses on the site, because the existing mature landscaping at the boundaries, would continue to act as a screen.

5.50 Therefore, we conclude that SMBC has reached incorrect conclusions in this regard.

Sustainability Appraisal

5.51 Although AECOM has updated the Sustainability Appraisal to inform the Draft Submission Plan, it has not revised the site assessments for those sites that it first reviewed in 2016 (ahead of the Draft Local Plan consultation). Consequently, the assessment of our Client's site by AECOM remains as it did in 2016. It remains the case that Site 111 is assessed alongside three other sites to form a cluster that is referred to as AECOM57. In our previous submissions, we have raised concerns about the way in which AECOM has scored our Client's site. That stems, predominantly, from AECOM's decision to group our Client's site with other sites, rather than carry out an individual assessment. On the basis that AECOM has not revisited this point, we conclude that it is appropriate to repeat the significant concerns that we have previously expressed.

- **Sa4a – Soil** – AECOM scores the site as neutral based on it comprising 'Best and Most Versatile' agricultural land. This is incorrect and may be an outcome of AECOM carrying out an assessment at too broad a scale. The DEFRA Magic Map confirms that Site 111 is Grade 4 agricultural land and is therefore not BMV. Applying AECOM's own scoring criteria, the site, if assessed independently of others, should have scored positively in this regard.
- **SA7 – Flood Risk** – AECOM score the site negatively because it concludes that up to 50% of the site is in either FZ 2 or 3. Again, this is a consequence of including other parcels of land that are far more susceptible to flood risk than Site 111. As we have explained, only 3% of Site 111 is in FZ 2, and the rest is in FZ1. Across a 3.9ha site, 3% of the site area is negligible and will not have any impact on development prospects. Consequently, we conclude that, if scored independently of the other sites, Site 111 should have been scored as neutral in this regard (based on AECOM's criteria).
- **SA12 – Historic Assets** – AECOM's site proforma says there may be a negative impact on the setting of heritage assets. The Vision Document prepared in support of Site 111 confirms that the nearest listed building is 369m away. As a consequence, we anticipate no impact on the setting of assets, and so the site should have been marked as neutral in accordance with AECOM's own criteria, had it been assessed on its own merits.
- **SA19a – Access to Key Economic Assets** – AECOM says that sites within 2.5km of 'key economic assets' (i.e. job opportunities) should be scored positively. The site is located circa 2km from the Town Centre, which is directly accessible via Widney Manor Road, and by bus and rail services, as

we have explained already in these representations. The figure of 3.5km quoted by AECOM is incorrect. The site should be scored positively in this regard.

- **SA19 – Access to Supermarket** – there is an error in the scoring here. AECOM say that the site will have a significant negative impact in relation to access to a supermarket. However, the SA says that significant impacts will arise only where a facility is more than 3km away from a site. AECOM’s analysis clearly states that the nearest supermarket to the site is circa 1.3km away. By AECOM’s own scoring system, it should not have been classified as a significant negative impact.

5.52 As a consequence, we conclude that: i) the SA should have scored the site on its own and not as part of a cluster of sites; and ii) that in doing so, the site should have been scored in the following way.

Adjusted SA Scoring for Site 111 (Avison Young Analysis)

SA1: Regeneration and Economic Development	SA2a: Distance to Primary School	SA2b: Distance to Secondary School	SA3a: Proximity to Bus and Train Services	SA53b: Proximity to Road Network	SA4a: Soil	SA4b: Minerals	SA7: Flooding	SA9: Enhance Ecological Sites	SA10: Landscape Sensitivity	SA11: Enhance Green Infrastructure	SA12: Enhance and Protect Historic Assets	SA14: Amenity	SA17a: Distance to Healthcare	SA17b: Access to Leisure Facilities	SA19a: Distance to Key Economic Assets	SA19b: Distance to Convenience Stores or Supermarket
Orange	Green	Grey	Green	Grey	Light Green	Grey	Grey	Grey	Grey	Light Green	Grey	Grey	Grey	Grey	Light Green	Orange

5.53 Had AECOM adopted this approach, then it is apparent that the effects of development of Site 111 would be as follows:-

- 2 significantly positive effects;
- 3 positive effects;
- 10 neutral effects; and
- 2 negative effects.

5.54 Evidently, on a correct analysis, it can be seen that the site has the potential to deliver 5 positive benefits, of which 2 are significant. This demonstrably outweighs only 2 potential negative effects (neither of which is significant). In all other regards, the site would lead to neutral outcomes.

Implications for Step 2 Analysis

5.55 Starting from the position that the site achieves a score of 5 / yellow from Step 1, it is apparent from the above that the following refined criteria should have been applied:-

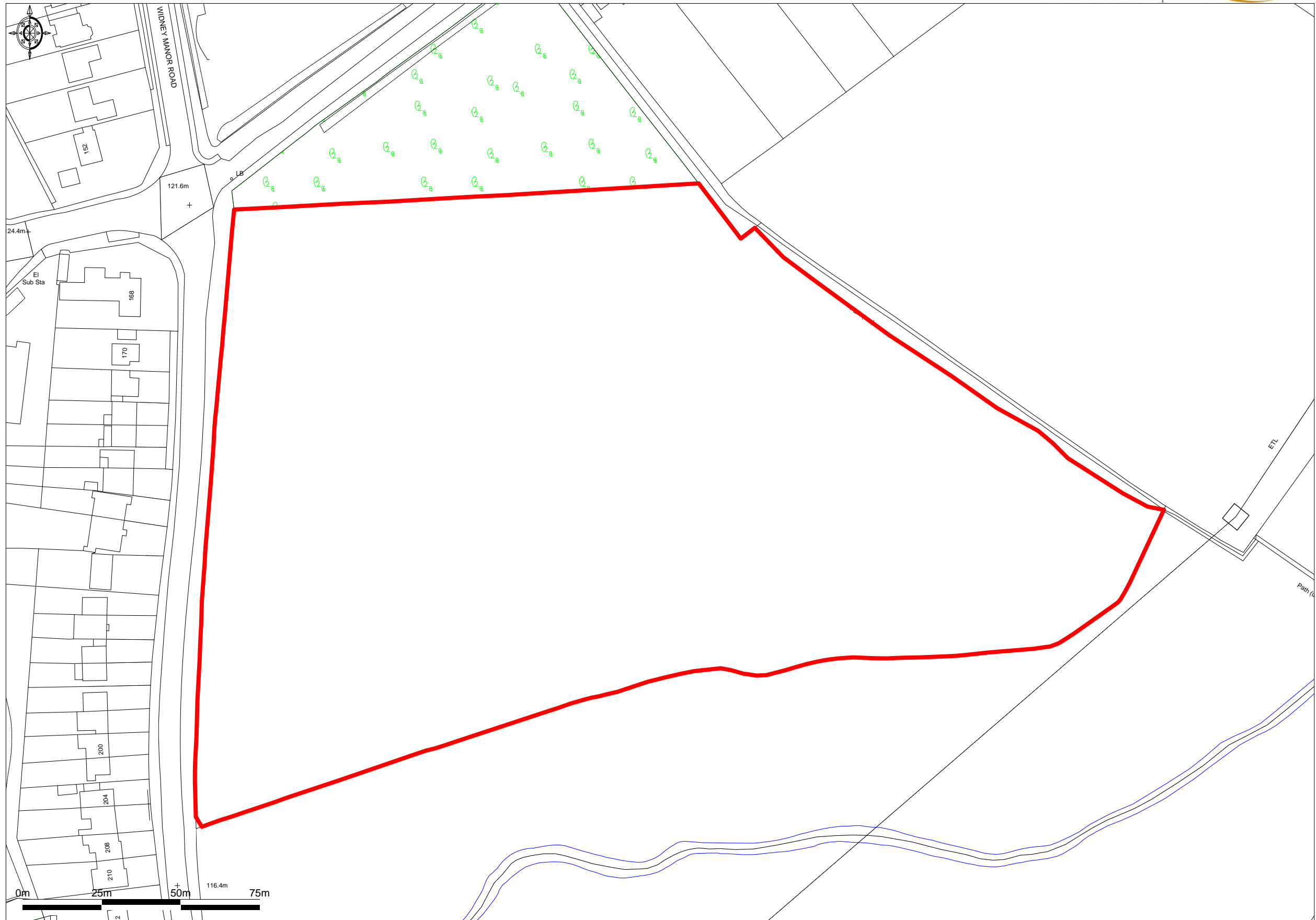
- the site is suitable, being free of from physical constraints and is achievable and available, and should be a Category 1 SHELAA site;
- the site benefits from substantial landscaped boundaries that would help to screen development and minimise impact on the landscape;
- an appropriate SA assessment demonstrates that there would be no significant harmful impacts arising, but instead there is potential for 2 significant positive impacts, and a further 3 positive impacts;
- the site benefits from strong defensible boundaries and other physical barriers just beyond its southern boundary that would prevent further encroachment; and
- the site is highly accessible by both bus and rail.

5.56 Notwithstanding our conclusions that Step 2 is flawed because there is no clarity over the way the Council has approached its planning judgements (such as whether it has applied any weighting to any of the factors), our view is that, on any application of planning judgement, the points we have made above weigh significantly in favour of the site. Put another way, we think the above factors, if adopted, would lead to the site being scored very positively by SMBC. This points overwhelmingly to a conclusion that Site 111 is capable of being developed without any adverse impacts arising and that it should be classified as green at the end of Step 2.

5.57 In the context of the conclusions we have reached in respect of: a) the Council making an insufficient and in any event unjustified contribution to the HMA shortfall; and b) the Council over-stating its supply of housing land, we conclude that Site 111, when properly assessed, can be identified as a suitable housing site that, if allocated, would help the Council remedy the deficiencies that we have identified.

Appendix I

Site Location Plan



Appendix II
2017 Vision Document

Widney Manor Road Solihull

Vision Statement
September 2017



Quality Checked*	e*SCAPE u r b a n i s t s The Studio, Hartsgrove Farm Hollin Lane Sutton Macclesfield Cheshire SK11 0NN Tel: 01260 253207 Email: hello@escape-urbanists.com www.escape-urbanists.com
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Date: September 2017	

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1. INTRODUCTION

THIS VISION STATEMENT HAS BEEN PREPARED ON BEHALF OF THE GOVERNORS OF THE SCHOOLS OF KING EDWARD VI IN BIRMINGHAM. IT RELATES TO A PARCEL OF LAND SOUTH OF SOLIHULL AND WHICH LIES TO THE EAST OF WIDNEY MANOR ROAD AND TO THE NORTH OF THE M42 AND THE RIVER BLYTHE. THIS STATEMENT DEMONSTRATES THE VIABILITY, DELIVERABILITY AND SUITABILITY OF THE SITE FOR HOUSING.

Introduction

This vision statement has been prepared to promote the allocation of a 3.99ha site on the southern edge of Solihull for housing development as part of Solihull Metropolitan Borough Council's Local Plan Review process. It has been prepared on behalf of the current owners of the site, The Governors of the Schools of King Edward VI in Birmingham (SKE).

The statement demonstrates the site's suitability for residential development. It identifies the key constraints, opportunities and technical considerations and concludes that residential development of an appropriate scale is entirely feasible on the proposed site. Furthermore, the site is shown to be a sustainable location for new housing development, benefitting from good accessibility by non-car modes and with good access to a range of local services and facilities.

This document provides clear guidance to the LPA on site capacity and presents an illustrative masterplan showing how the site could be developed for up to 50 units. The masterplan illustrates how the site could be developed for new housing without negatively impacting on the surrounding landscape character or amenity of existing housing on adjacent sites.

The Site

The site falls within the administrative boundaries of Solihull Metropolitan Borough Council (SMBC). It is located approximately 2km south of Solihull town centre, to the east of Widney Manor Road and to the northwest of the M42 and the River Blythe. Solihull is located to the south east of Birmingham within the West Midlands county and conurbation.

The site forms part of a much wider landholding owned by SKE,

which extends south of the M42 and to the east towards the junction of Lady Byron Lane and the A4141.

The site comprises a parcel of agricultural land defined by strong boundary hedgerows and a number of mature trees. The site slopes gently downwards from north to south and sits very slightly above the level of Widney Manor Road. The site is located in the West Midlands Green Belt.

There is currently a single farm access to the land from Widney Manor Road, located close to the south-western corner of the site. Widney Manor Road provides a direct vehicular route to Solihull Town Centre, located to the north of the site.

The western boundary of the site follows Widney Manor Road. This boundary is lined with mature trees and a hedgerow following a timber fence line. The western side of the road is lined with large residential properties with driveways at the road frontage.

The northern boundary of the site is formed by a generous area of open space which separates the site from Lovelace Avenue. The open space comprises a mix of open grassed areas and mixed scrub with mature trees and hedgerows to its northern edge. Lovelace Avenue is a restricted access road leading on to a linear residential area with large detached properties located on both sides of the road.

To the east of site, a public footpath follows the site boundary. The route is lined with a hedgerow and mature trees which provide separation between the site and the adjacent arable field.

The southern boundary is followed by a public footpath and hedgerow with sporadic specimen trees along its length. The hedgerow forms the separation between the site and adjacent narrow field which accommodates the northern bank of the River Blythe.

Planning Policy Context

SMBC adopted its Core Strategy in December 2013. However, following a successful legal challenge to the Local Plan, policies relating to housing need and supply were quashed and remitted back to SMBC for revision. As a consequence, SMBC currently does not have an adopted housing target. To address this, SMBC is preparing a new Local Plan (named the 'Local Plan Review'), which, when adopted, will replace the 2013 Local Plan.

Furthermore, in January 2017, Birmingham City Council adopted the Birmingham Development Plan (BDP). The BDP identifies a housing need of at least 89,000 new dwellings in the period to 2031. However, the BDP states that there is only sufficient land available to deliver 51,100 dwellings in Birmingham City Council's administrative area. As a consequence, there is a significant shortfall in the extent to which Birmingham City Council can meet is objectively-assessed housing need.

In the context of: i) the shortfall arising in respect of Birmingham's housing need; and ii) the successful legal challenge to the 2013 Solihull Local Plan, SMBC has engaged in the preparation of Strategic Housing Needs Studies ('SHNSs') by PBA on behalf of the Greater Birmingham and Solihull Local Enterprise Partnership ('GBSLEP').

The work undertaken by PBA has comprised three phases, which were completed between January 2014 and November 2015. It culminated with the third SHNS considering options for the spatial distribution of housing need within the Greater Birmingham Housing Market Area.

More recently, and following on from the SHNSs, PBA has prepared further evidence base reports for SMBC. These include the SHELAA (described in Section 1), and also a Strategic Housing Market Assessment ('SHMA'), both of which were published in November

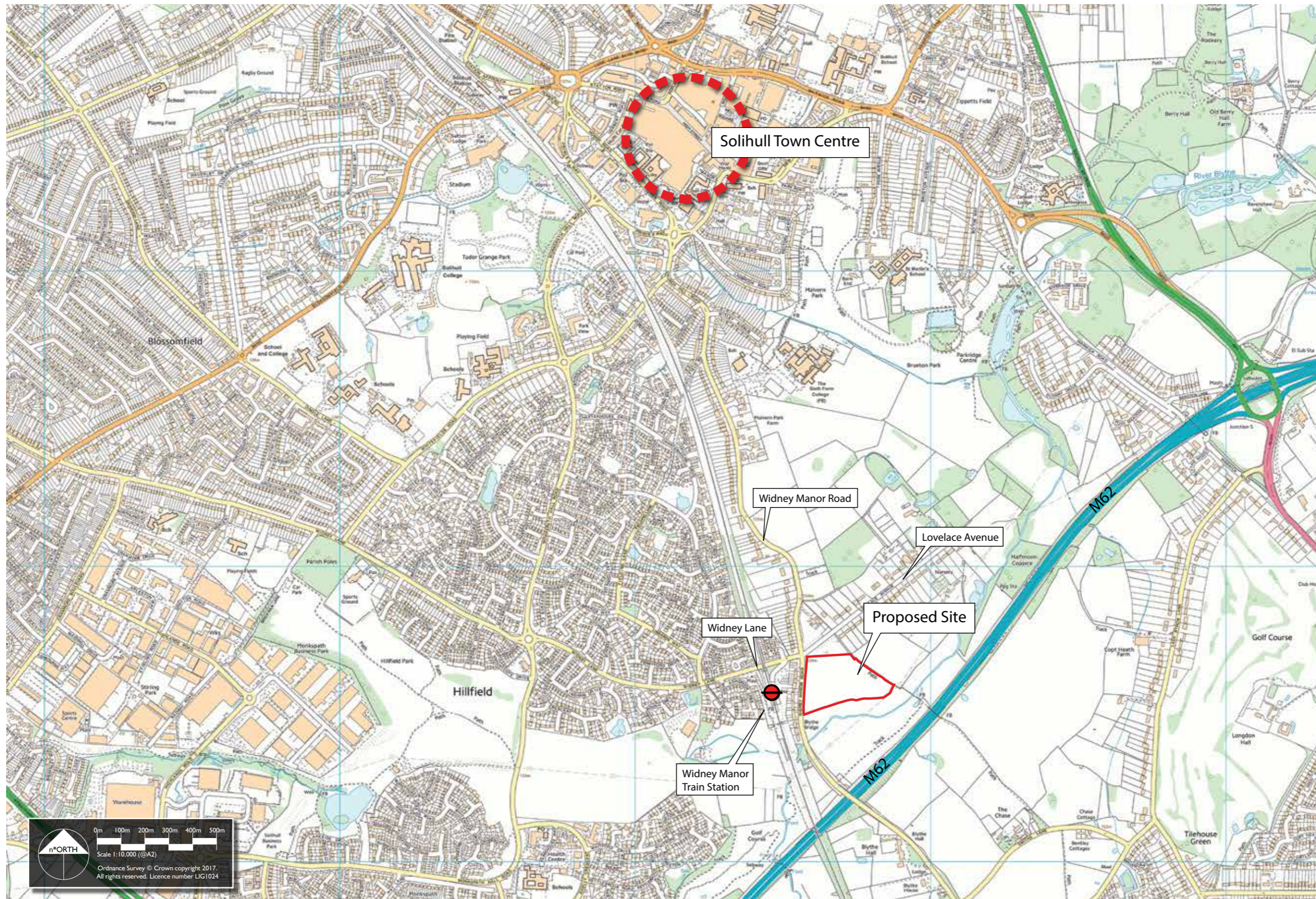


Figure 01.01: Location Plan



Figure 01.02: Site Boundaries

2016. The SHMA focussed in detail on the housing need for Solihull Borough. That report reached conclusions on the amount of housing which would need to be delivered in order to meet SMBC's objectively-assessed housing needs in full, whilst accommodating a proportion of Birmingham's housing shortfall.

Accordingly, the Local Plan Review will, amongst other things, identify a new, up-to-date housing target for the Borough, and will confirm on which sites new dwellings will be constructed in order to meet that target. This will include the release of sites from the Green Belt where necessary.

In 2015, SMBC carried out a 'call for sites' exercise, to which this site was submitted as a potential location for new residential development. This was followed by the publication of the 'Preferred Options' version of the Local Plan in 2016. The site at Widney Manor Road was not identified as one of SMBC's preferred sites for accommodating new residential development. On behalf of SKE, GVA submitted representations to SMBC in respect of the Preferred Options document. Those representations sought to: i) explain why the housing target proposed by SMBC was not capable of meeting the full objectively assessed needs (FOAN) for the area; and ii) on the assumption that the FOAN for Solihull was greater than assumed by the Council, promote SKE's land as a suitable housing site which should be released from the Green Belt and allocated for development.

The purpose of the Visioning Statement is to build on those representations and provide further evidence of the deliverability of SKE's land.

Scope & Content

The following chapter (Chapter 2) presents our vision for a high quality residential development on the proposed site. In Chapter 3, information is provided on the local context, including access to services and facilities. Chapter 4 describes the key physical characteristics of the site, highlighting the technical constraints and opportunities that have been identified through our initial survey work. This information has informed the production of an illustrative

masterplan presented in Chapter 5. Chapter 6 considers landscape setting and character and analyses the potential effects that a proposed residential development may have on the surrounding landscape and visual amenity. It also makes recommendations that will minimise any adverse visual effects of the development. Our conclusions are provided in Chapter 7.



2. VISION

“The site offers the opportunity to create a high quality residential development in a sustainable location close to existing services and amenities and with good access by road and public transport. The development will provide a mix of housing types and tenure to cater for local needs.

This will be a high quality development that reflects and reinforces the existing residential character of this part of Solihull. It will be characterised by attractive streets, public open spaces, eye catching houses and high quality hard and soft landscaping. New housing will be sympathetic to the existing character of the local area, being of an appropriate scale, density and appearance.

The development will be carefully designed to minimise any potential effects on character of the surrounding landscape and visual amenity of existing properties. This will be achieved by retaining existing on-site vegetation, creating appropriate landscape buffers and by the siting, layout and density of development within the site.”



Figure 02.01: Precedent Images

3. LOCAL CONTEXT

THE SITE IS LOCATED ON THE EDGE OF THE EXISTING URBAN AREA OF SOLIHULL AND BENEFITS FROM EXCELLENT ACCESS BY WALKING, CYCLING AND PUBLIC TRANSPORT. THIS IS A SUSTAINABLE LOCATION FOR NEW HOUSING DEVELOPMENT, BEING CLOSE TO A RANGE OF EXISTING SERVICES AND FACILITIES.

Location

The site is located to the east of Widney Manor Road and to the northwest of the M42, approximately 2km south of Solihull Town Centre. Solihull is located to the south east of Birmingham within the West Midlands county and conurbation. The site directly fronts the eastern side of Widney Manor Road, to the south of its junction with Widney Lane and Lovelace Avenue.

Surrounding Land Uses

Located on the southern edge of the existing urban area of Solihull, the surrounding context is strongly residential. The nearest residential properties are located immediately to the west along Widney Manor Road. Existing housing is also located immediately to the north along Lovelace Avenue. Figure 03.02 below provides examples of the typical housing that can be found close to the site.

To the north (beyond Lovelace Avenue), east and south, the site is largely surrounded by agricultural land.

Widney Manor Golf Course is located to the south-west. There is also a railway line to the west of the site and the River Blythe and M42 to the south east.

The existing land use of the site is agricultural.

Local Facilities

Access to local amenities is a basic requirement for a development site in ensuring any development proposals positively contribute to both the site's and local community's social, economic and environmental sustainability.

Solihull town centre is located within 2km of the site and provides a large range of amenities and leisure facilities. Suitable pedestrian and cycle connections are available to the town centre and cycle

times are less than eight minutes.

The site is well located within the preferred maximum walking distance of several primary and secondary schools. The nearest primary school, St Alphege Church of England Junior School, is within 1.2km of the site (15 minute walk). Bentley Heath Primary School and Monkspath Junior & Infant School are located 1.7km and 2km of the site respectively. In terms of secondary schools, both St Peter's Catholic School and St Martins Secondary School are within a 2km radius of the site.

The nearest supermarket is a Co-op store within Bentley Heath local centre on Widney Road, approximately 1.8km to the south-east. The local centre also supports post office, butchers, newsagents, off licence and florists. Convenience retail within Solihull town centre includes a Sainsburys, Morrisons, Waitrose and Spar.

Monkspath local centre is located 2km south-west of the site and supports a Co-op store, health centre, post office, pharmacy and restaurant.

Opportunities for outdoor recreation can be found a short distance to the west and include Widney Manor Golf Course, Hillfield Park, Solihull Sports and Social Club. To the east is Copt Heath Golf Club and Tudor Grange Park is located less than 2km away to the south of the Town Centre. The site has good links to the local footpath network providing access to the surrounding countryside for walking and cycling.

In terms of indoor leisure facilities, there is a health club and spa less than 600m to the west along Saintbury Drive. Additional facilities can be accessed in the town centre including Tudor Grange Leisure Centre.

The site has good road and rail links surrounding towns and cities for employment including Birmingham, Coventry, Warwick, Leamington

Spa and Bromsgrove.

Accessibility

The site benefits from excellent accessibility for cyclists and pedestrians with good links with the town centre and other local amenities.

Continuous footways are provided on at least one side of the carriageway between the site, Solihull town centre and Widney Manor Station. There is a permeable network of pedestrian and cycle routes throughout the local area, including a number of off-road routes, which provide direct access to local amenities and services within Monkspath, Solihull and surrounding areas. A shared use path is provided from Widney Manor Station to the local centre located off Monkspath Hall Road. This route continues towards local areas including Shirley, Hockley Heath and Dickens Heath. The majority of residential streets between the site and local amenities benefit from a footway on both sides of the carriageway with a permeable network of footpaths connecting cul-de-sacs. These provide direct connections to the local area and Solihull town centre.

The site also benefits from excellent access to the local and regional road network. Widney Manor Road is a 6.5m wide single carriageway road connecting Solihull and Dorridge to the north and south respectively. Widney Lane joins Widney Manor Road at the north-west corner of the site and provides access to local employment opportunities to the west (Monkspath Business Park) as well as Solihull Retail Park. The A41 can be accessed north of the Town Centre and provides access into Birmingham.

Access to the regional and national motorway network can be gained via junction 5 of the M42, approximately 3.5km to the north-east) via Solihull Town Centre. Junction 4 of the M62 is located to the south-west and can be accessed from Stratford Road.

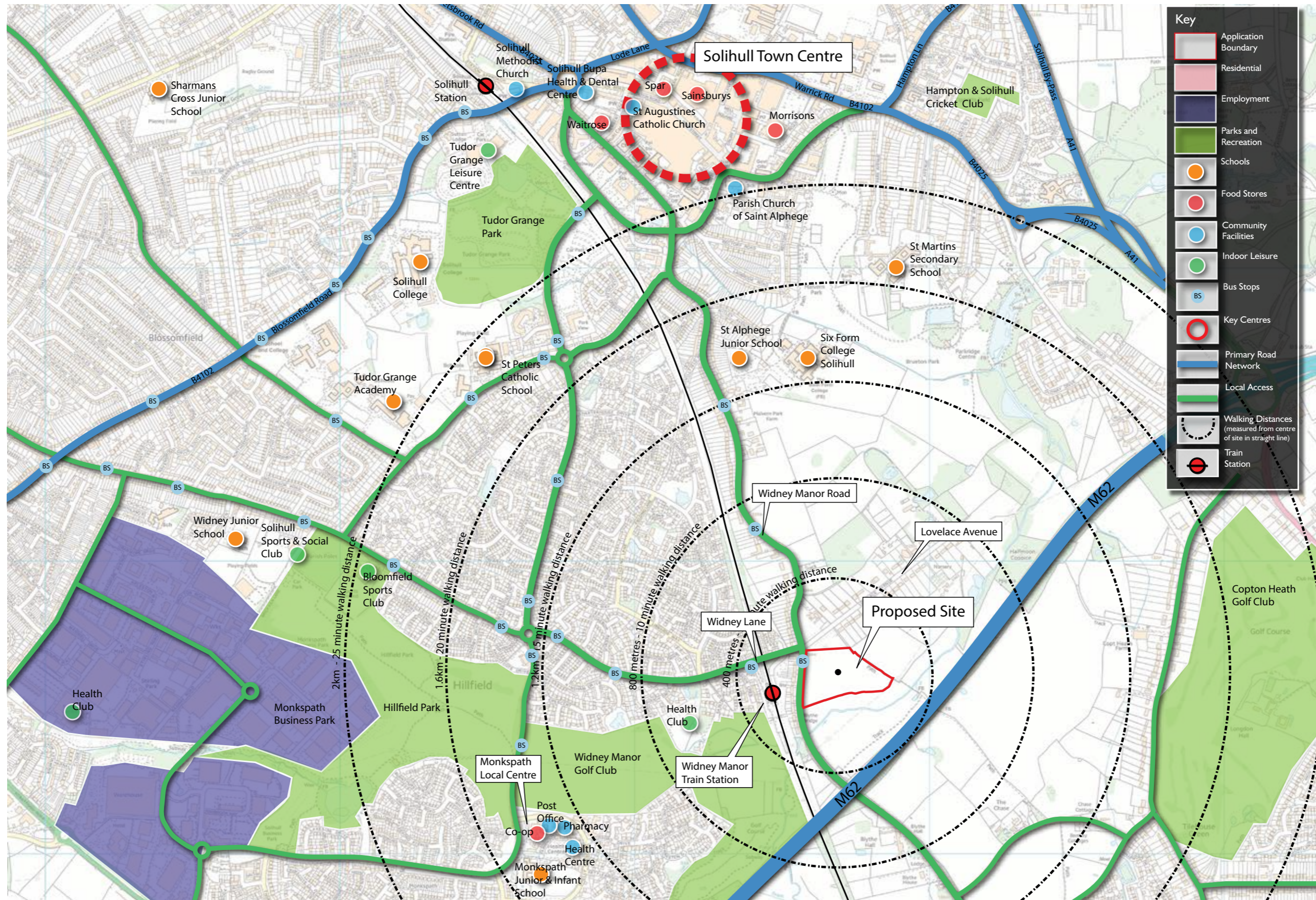


Figure 03.01: Local Context

Public Transport

Widney Manor railway station is located approximately 400m from the site and is served by a train every half hour between Dorridge and Birmingham. These services then continue to Worcester, Stourbridge and/ or Kidderminster. Journey times for trains between Widney Manor and Birmingham (Snow Hill and Moor Street) are less than 20 minutes. There are also daily services directly to London Marylebone with more frequent services available from Solihull train station.

The nearest bus stops are located on Widney Manor Road and are accessible using existing pedestrian infrastructure. The stops are served by the S2 bus which provides a half hourly service, Monday to Saturday, between Cheswick Green and Dorridge via Solihull and Bentley Heath. Journey times are approximately ten minutes to Solihull Town Centre. The Widney Manor Road stops are also served by 812 bus, a daily return service to the Blossomfields Schools.

Approximately 300m west of the site an additional bus stops are provided at Widney Manor Station. They are served by the number 5 bus which routes between Solihull and Birmingham via Hall Green. It provides three services an hour Monday to Saturday and two services an hour on Sundays. Journey times to Solihull are again approximately ten minutes and to Birmingham are one hour.

Local Context Summary

- Established residential neighbourhood with existing housing immediately adjacent to the site along Widney Manor Road and Lovelace Avenue.
- Good range of convenience stores within easy access of the site.
- Solihull town centre is located within 2km of the site and provides a large range of amenities and leisure facilities.
- Three Primary Schools within a 2km radius of the site.
- The nearest secondary school is less than 2km away.
- Good access by public transport with bus stops located immediately adjacent to the site along Widney Manor Road.
- Widney Manor railway station is within easy walking distance of the site and provides two services an hour to Birmingham Stations.
- There is a permeable network of pedestrian and cycle routes throughout the local area, which provide direct access to local amenities and services within Monkspath, Solihull and surrounding area.



Figure 03.02: Surrounding Built Context

4. THE SITE

THE PHYSICAL CHARACTERISTICS, CONSTRAINTS AND OPPORTUNITIES PRESENTED BY THE SITE HAVE BEEN ASSESSED AND ARE SUMMARISED BELOW. IT IS DEMONSTRATED THAT THE SITE IS ENTIRELY SUITABLE FOR RESIDENTIAL DEVELOPMENT OF AN APPROPRIATE SCALE AND FORM.

Introduction

A range of technical studies and surveys have been carried out to identify possible constraints to development and to establish the feasibility of developing the site for housing. These include studies into access, transport, infrastructure, ecology, heritage, noise, flood risk, landscape and visual impact.

Whilst initial investigations have revealed a range of factors that will need to be taken into account when developing the site, none of the constraints identified are considered to pose a significant technical barrier to the proposal.

The various constraints and opportunities presented by the site are illustrated in Figure 04.01 opposite.

Access

There is currently a single gated farm access to the land from Widney Manor Road, located close to the south-western corner of the site. Widney Manor Road provides a direct vehicular route to Solihull Town Centre, located to the north of the site.

Widney Manor Road is a 6.5m wide single carriageway road. It is relatively straight along its section where it adjoins the western boundary of the site. The speed limit on this part of the road is 30 miles per hour. This increases to 40 miles per hour further to the south of the site close to where it crosses over the M42.

There are two bus stops located on Widney Manor Road, along the site frontage. The site is also located close to Widney Manor railway station.

Rights of Way

A Public Right of Way (Part of the Green Man Trail) runs adjacent to the site's eastern boundary, connecting Lovelace Avenue to the north with the River Blythe. The footpath continues southwards via a footbridge over the M42 before joining Smiths Lane.

A second Public Right of Way enters the site from Widney Manor Road and extends along the site's southern boundary. On exiting the site, the footpath heads south over the River Blythe via a small footbridge before heading east again, following the river as far as Oldway Drive/Warwick Road.

In addition to the above formal pedestrian routes, it is evident that members of the public also use the northern and western margins as well.

Flood Risk

The majority of the site is located within Flood Zone 1 which is associated with low flood risk. However, a small portion of the south eastern corner of the site (approximately 0.13ha) is shown to be located within Flood Zone 2.

A Flood Risk and Drainage Feasibility Report has identified that the risk of flooding from all sources including fluvial, groundwater, artificial, sewers and lakes and reservoirs is low. Due to the presence of a 900mm aqueduct crossing the south-east corner of the site, the risk of flooding from burst water mains is considered to be low to medium.

Drainage

The greenfield site is not currently drained by a positive drainage system. At present, during a normal rainfall event, rainwater infiltrates into the ground and during extreme rainfall events surface water run-off from the site flows towards the south where it naturally discharges into the River Blythe.

There is a small land drain running immediately outside of the eastern boundary of the site, although this feature is not thought to serve the site. Sewer records obtained from Severn Trent Water show that the residential areas to the west and north-west of the site are drained by a separate public foul water and surface water sewer network.

A dry ditch runs beneath the hedgerow on the southern site boundary. A wet ditch is present along the site's eastern boundary containing shallow water and earth banks, up to approximately 1m in height.

Considering the impermeable nature of the existing ground (generally underlain by Mercia Mudstone), infiltration techniques are unlikely to be a suitable methodology for the disposal of surface waters. However, this needs to be confirmed by site specific soakaway tests.

Views

The site benefits from substantial mature landscape screening along much of its boundary to Widney Manor Road. When combined with the topography, the site is only glimpsed in places when travelling in a southerly direction from Solihull. Furthermore, the substantial boundary landscaping provides an effective screen of the site from the properties on the western side of Widney Manor Road.

On the southern side of the M42 (which lies in cut), Widney Manor begins to rise. Although the site is visible in those middle-distance views, it is seen in the context of substantial landscaping both along the boundaries of the site and on land between the site and the



Figure 04.01: Physical Characteristics

motorway.

When travelling along the M42, the site sits at a significantly greater level above the motorway, and is screened by landscaping, such that it cannot be seen.

From within the site, there are views towards existing houses along the western side of Widney Manor Road although these are partly screened by trees along the site's western and southern boundaries. Looking north-east across the site, there are views towards the rear of houses along Lovelace Avenue.

Topography

The site is on a gentle southeast-facing slope with elevations between approximately 115m and 125m OD. A topographical survey was carried out in May 2017. This shows that the site generally slopes down in a southerly direction. Towards the northern boundary the average ground level is approximately 124m AOD and to the south of the site approximately 116m AOD.

Trees

There are no protected trees within or immediately adjacent to the site. Individual trees including several large Oaks are present along the eastern and southern boundaries although the condition of these trees varies. Trees along the western boundary have become encompassed into the hedgerow. Scattered scrub is evident along the banks of the ditch on the eastern boundary. Tree and scrub species include Oak, Holly, Gorse, Broom, Ash and Horse Chestnut.

A triangular shaped parcel of open space extends along the site's northern boundary, separating it from Lovelace Avenue to the north. There are a number of mature trees located here, some of which have canopies (and possibly root protection areas) that are likely to extend into site boundary.

Hedgerows

The site's northern, western and southern boundaries are defined by largely intact hedgerows that fit the criteria for inclusion under the Priority Habitat Hedgerows. The southern boundary hedgerow would classify as Important under the Hedgerow Regulations 1997. It is located adjacent to a public footpath, has an average of four

woody species, a ditch along at least half of its length and less than 10% gaps.

The northern and southern hedgerows are well managed and dominated by hawthorn measuring between 1m and 1.5m in height.

The western site boundary is also formed from a hedgerow, although this had been encroached by the roadside trees.

Utilities

A comprehensive services search has been carried out to establish the approximate location of existing recorded services within the vicinity of the site.

The National Grid record plan shows a high pressure (HP) gas main crosses the site from the south-western boundary and exits at the eastern boundary. The gas main contains a 1.5m easement, either side of the centre line of the pipe, which is undevelopable land.

HP gas mains are also subject to consultation guidance by the Health and Safety Executive (HSE), which stipulates the stand-off distances based upon several variables. Initial discussions with the HSE have confirmed the following consultation zones (either side from the centre of pipeline);

- Inner 15m
- Middle 36m
- Outer 48m

These buffer zones specify what development type can be built within what zone. Under current guidelines, the HSE would typically advise against housing development (over 30 units in size) within 36m (middle zone) either side of the gas pipe. However, the process can be subjective and decisions are usually made on a site by site basis. Further consultation will be required with the HSE to determine appropriate buffer zones.

The Severn Trent Water sewer record plan shows that there is a 975mm diameter foul water sewer that runs within the site boundary close to the south-east corner of the site. A minimum easement of 5m on either side from the centre line of the existing 975mm foul sewer will be required. This needs to be confirmed by Severn Trent

Water.

There is a 225mm surface water sewer that runs from north to south along Widney Manor Road. Some sections of this pipe are likely to fall within the far western boundary of the site. A 3m easement on either side from the centre line of the existing 225mm surface sewer part of which is located within the site boundary will also be required.

The Severn Trent Water water main record plan shows that there is a 900mm diameter aqueduct crossing the south-eastern part of the site. A minimum easement of 5m on either side from the centre line of the existing 900mm aqueduct will be required.

There is also a 300mm diameter trunk main and a 150mm diameter distribution main located in Widney Manor Road to the west of the site.

A **Foul Water and Utilities Statement** has identified the locations of existing utilities apparatus in the vicinity of the site and provides an account of the viability of servicing the proposed development with suitable mains services infrastructure. The report concludes that the site and its surrounds are well served by existing utilities infrastructure. It is not anticipated that any reinforcement works will be required for the electricity, clean water and foul drainage networks. The surrounding area is also well served by the existing gas network, although there may be a need for reinforcement works to supply the site.

High voltage (132kV) overhead cables skirt the south-eastern boundary of the site but are considered a sufficient distance away from the site that diversionary works will not be required.

Noise

A preliminary noise assessment has been carried out to identify noise constraints and opportunities on the site, and to assess the overall site suitability for residential use from a noise perspective.

The survey has revealed that some mitigation will be required to ensure noise levels for gardens and internal noise levels in the day and night-time periods meet appropriate standards.

It has been demonstrated that with standard double glazing and standard trickle ventilation, internal daytime and night-time noise level criteria could be met for a series of example dwellings representative of worst affected future dwellings. Similarly, with appropriate use of acoustic bunds/barriers, garden fencing and careful orientation of dwellings, daytime noise levels in gardens close to the boundaries

A **Noise Survey** was undertaken over a 3-hour weekday period between approximately 12:00 and 15:30 on Thursday 20th April 2017 to determine the current typical weekday daytime noise.

The assessment has identified the dominant sources of noise across the site to be road traffic noise from Widney Manor Road to the west of the site and the M42 to the east. Additional occasional contributions were noted from movements on Lovelace Lane. Distant train horns were noted from trains on the railway embank further west.

should meet the external target noise levels.

The noise assessment concludes that the site in principle is suitable for residential use from a noise perspective.

Ecology

The site itself is not designated for its nature conservation interest. However, the site falls within the SSSI Risk Zone for the River Blythe, located approximately 50m south. This river is described as a “particularly fine example of a lowland river on clay.”

Land between the site and this river is designated as a potential Local Wildlife Site.

Other habitats within the site are considered to be of lower ecological

A **Preliminary Ecological Assessment** was carried out in April 2017. The study included an assessment of the site’s potential to support protected and notable fauna. In summary:

- Mature trees around the site boundaries are identified as having some potential to contain features suitable for roosting bats.
- The hedgerows, scrub and ditches around the site boundaries would provide a high volume of invertebrate prey items for foraging bats and linear features are often used as commuting routes.
- The trees, scrub and hedgerow offer potential nesting and foraging habitat for birds.
- No evidence of Badger activity was observed during the survey although the site offers some habitat potentially suitable for sett building, as well as foraging and commuting.
- There are no waterbodies within the site itself and therefore no potential breeding habitat for amphibians.
- Development of the site is considered unlikely to have any direct impact on any Riparian mammals using the River Blythe.

value. The arable field, which forms the main body of the site, is of low ecological value, given the lack of wild plant species and the intensive management for agriculture.

Heritage & Archaeology

A Heritage Assessment has considered the potential impact of the development on historic assets within the vicinity of the site in the context of existing planning policy and guidance. The study has also assessed the nature, extent and potential significance of any surviving archaeological resource within the site.

Seven listed buildings have been identified within a 1km radius of the site. The closest of these, No. 79 Lovelace Avenue (Grade II, 1955-59), is located approximately 360m north-east of the centre of the site. Copt Heath Farmhouse (Grade II, C17), is located approximately 1km to the east. The remaining 5 buildings are located within the built up area to the west of the site and have no interaction with it. In addition, there is one scheduled monument in the study area. This is the Tilehouse Green moated site (Scheduled Monument ref: 1017525).

The Heritage Assessment concludes that there will be no direct impact on any designated heritage assets. Due to intervening vegetation, major roadways and topography there is no intervisibility between the proposed development area and the designated heritage assets. The overall effect of the development is therefore assessed as being neutral.

There are no archaeological works recorded within the proposed development area. Overall, the potential for a significant archaeological resource to be present on the site is considered to be low. The Heritage Assessment identified very limited evidence to indicate a prehistoric or Roman presence in surrounding area and it is considered unlikely that a resource of this date exists on the site.

Summary

Initial investigations have revealed a range of factors that will need to be taken into account when developing the site. None of the constraints identified are considered to pose a significant technical barrier to the proposal. Factors to consider include the need to: minimise any impact on the adjacent River Blythe SSSI; incorporate existing hedgerows and mature trees; incorporate and provide links to existing rights of way; and mitigate potential noise sources.

Whilst diversionary works to the existing gas, telecommunications, clean water and sewer infrastructure present within the site may be required in order to maximise the development potential of the site, it is also possible to deliver a scheme which works with these constraints and retains existing apparatuses in-situ. This is demonstrated by the masterplan presented in the following section.

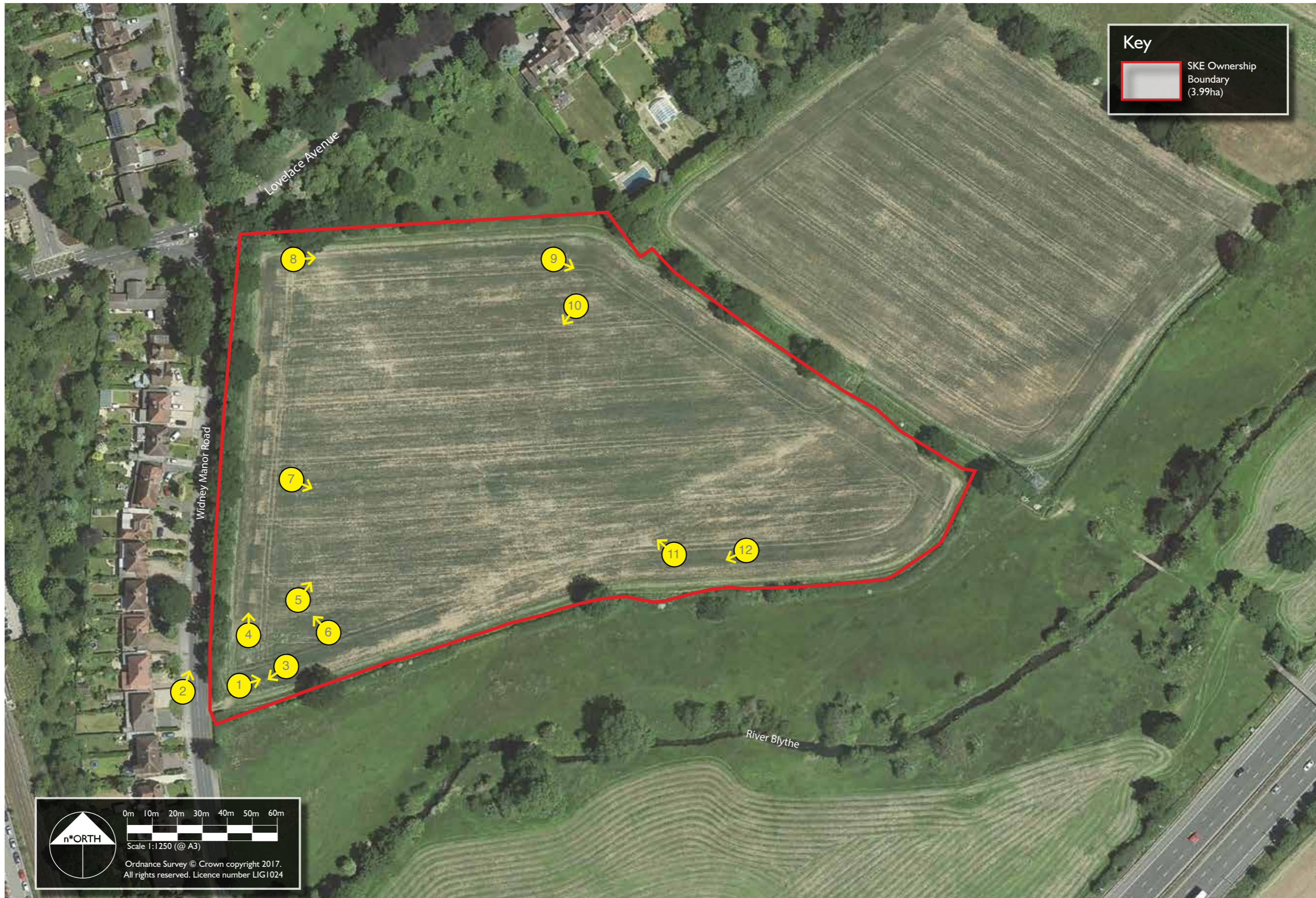


Figure 04.02: Site Photos (Viewpoints)



View looking east along southern boundary



View north along Widney Manor Road (site on right)



View of existing access from Widney Manor Road



View looking north along western boundary



View looking north-east across the Site



View looking north-west towards western boundary



View looking south-east across the site towards southern boundary



View looking east along northern boundary



View looking south-east towards eastern boundary



View looking south-west across the Site



View looking north-west across the Site



View looking west along southern boundary

Figure 04.03: Site Photos



Figure 04.04: Panoramic Views of the Site

5. SITE MASTERPLAN

AN ILLUSTRATIVE MASTERPLAN HAS BEEN PRODUCED TO DEMONSTRATE THE CAPACITY OF THE SITE TO ACCOMMODATE NEW HOUSING. THE MASTERPLAN ILLUSTRATES AN APPROPRIATE URBAN DESIGN RESPONSE WHICH TAKES ACCOUNT OF KNOWN SITE CONSTRAINTS AND OPPORTUNITIES.

Introduction

In order to demonstrate the feasibility of developing the site for housing, and to provide an indication of yield, an illustrative masterplan has been prepared and is presented below.

Figure 05:01 illustrates the proposed structure and layout of the site. It shows how the constraints and opportunities analysis has developed into a parameters masterplan showing spatial relationships between the built form, movement hierarchy and open space. It also illustrates the proposed access arrangements for the site and provides an overview of development density and yield on a parcel by parcel basis.

The parameters plan has formed the basis for the illustrative masterplan presented in Figure 05:02 which includes additional layers of detail in terms of building plots, house types and car parking.

The illustrative masterplan presented here, whilst not a final design, is intended to demonstrate the feasibility of developing the site for housing. However, other potential approaches to the layout and design of the site may be possible.

At this stage, we have adopted a cautious view with regard to the potential constraint posed by the existing gas main. A 'worst case scenario' approach has been taken which excludes housing development from within 36m of the gas main (the 'Middle' zone). For this reason, and given the presence of existing services in the south-east corner of the site, the parameters plan proposes to concentrate development within the northern part of the site as indicated by the revised red line. However, development of larger area of land is not discounted and the layout has allowed for this possibility. Further consultation with the HSE will be required to determine the precise extent of the buffer zone required which will influence the potential development envelope.

The following narrative provides a brief overview of the masterplan, outlining key parameters and design principles.

Access

Access to the site will be provided via a simple priority junction located in the south-west corner onto Widney Manor Road.

A preliminary access design has been prepared and this demonstrates that an access arrangement can be provided that accords with the relevant design standards. The proposed access would take the form of a 6m carriageway with 2m wide footpaths on either side and a junction radius of 6m.

Appropriate minimum visibility splays have been identified which take account of vehicle speeds, traffic volumes and road conditions along Widney Manor Road. It is demonstrated that the desired minimum visibility can be achieved within highway land and adjacent land in the control of the site owner.

A junction capacity assessment has been undertaken to understand whether the proposed access arrangements would operate within capacity for future years of 2022 and 2028. To allow for the possibility of developing a larger area of the site over the longer term (subject to the view of the HSE on the gas main issue), the assessment is based on a development of up to 100 dwellings.

The study indicates that the access would operate with significant reserve capacity for a future year of 2028. The vehicle demand associated with 100 dwellings would equate to circa 50 two way trips in each peak, which is less than one trip per minute, thus the impact of the development would not be significant.

Yield and Density

The proposed development site measures 2.79ha (gross) in total

of which approximately 1.61ha is shown as developable land for new housing. The masterplan shows 1.18ha of green infrastructure and public open space within the red line boundary. Approximately 1.2ha of land within the wider SKE ownership is proposed to be retained in agricultural use. It is proposed that up to 50 homes can be accommodated on the site at a net average density of 31 units per hectare.

The highest density would be most appropriately located towards the centre of the site along the main street. The illustrative masterplan shows a greater proportion of semis and townhouses along this route. Around the edges of the site, and particularly along the rural interface to the south, the density should reduce and the predominant form of housing should be larger detached dwellings with good separation between buildings to provide a softer built edge to the development.

Layout

The parameters masterplan shows indicative development parcels and orientation of buildings within them. A total of four development parcels are shown ranging in size from 0.27ha up to 0.55ha.

An urban block structure is proposed with houses facing onto the street providing natural surveillance and active frontages.

A new secure boundary is created along the northern edge of the site created by the rear gardens of properties. Tree planting in the rear gardens of properties in Parcel 4 will help to maintain the visual amenity of existing houses along Lovelace Avenue to the north and views into the site from the existing Public Right of Way along the eastern boundary.

The built form is concentrated on higher ground towards the northern end of the site where the risk from flooding is reduced and the land is less constrained by existing underground infrastructure. Development is located outside of the 36m buffer zone for the gas



Figure 05.01: Parameters Masterplan

main. Concentrating development at the northern end of the site also reinforces the existing urban edge of Solihull and reduces the impact of the development on the wider countryside and views from the south and east.

Houses in Parcels 1 & 2 along the western edge are set back from the site boundary to avoid the existing surface water sewer and the root protection areas of the existing trees which are an attractive feature along Widney Manor Road and would be retained.

The layout creates an outward-facing development that ensures a large number of new properties benefit from attractive open views to the south across the existing field towards the River Blythe.

Movement Hierarchy

The parameters masterplan shows a clear movement hierarchy based on an interconnected network of streets, shared-surface lanes, private drives and footpath/cycleways.

The main access road into the development enters the site at the south-west corner and provides access to the houses in Parcel 2. It extends north-east across the site before turning north to serve houses in development parcels 1, 3 & 4.

A piece of public realm in the form of a Square is shown at the point where the main street turns north. This would be a suitable location for a children's play area, community orchard and place for residents to interact, relax and enjoy views of the surrounding countryside.

A series of shared surface lanes and private drives extend off the main street, serving houses around the edges of the site.

The existing public right of way that extends along the southern boundary would be retained and could be enhanced/upgraded. New footpath connections would be provided between the proposed houses and the existing rights of way to the south and east. Footpath connections would be provided onto Widney Manor Road to improve access to public transport and respond to likely desire lines.

Public Open Space

The majority of the wider site (60%) is likely to be retained as either public open space or for agricultural use, particularly to the south and

south-east, owing to the presence of existing underground services.

This provides significant opportunities for new tree planting within the site help filter views of the development from the surrounding countryside. It also provides the opportunity to significantly enhance on-site biodiversity through the creation of new habitats including wooded areas and water features.

A green buffer would be provided along the site's western boundary with Widney Manor Road to protect the existing trees and maintain a corridor for the movement of wildlife that would extend to the existing area of open space adjacent to the northern boundary.

Children's play facilities would be provided in accordance with SMBC standards. The masterplan shows an indicative location for a children's play area that would benefit from surveillance by surrounding houses as well as being easily accessible.

Landscape Strategy

The overall aim of the landscape strategy would be to provide an appropriate and attractive landscape setting for the development that provides an attractive settlement edge to the Widney Manor area of Solihull and ensures the development is successfully integrated into the adjacent countryside.

Key elements would include:

- Retention of existing hedgerows and tree planting along the boundaries of site.
- Provision of green buffer along site's western boundary with Widney Manor Road.
- Existing hedgerow gaps to be in-filled with native species of planting to enhance and increase the biodiversity value and green infrastructure network.
- Robust buffer of planting along boundaries adjacent to the rear gardens of the properties on Lovelace Avenue.
- Replacement planting to mitigate loss of any hedgerows removed to provide access to the site
- Large area of public open space has been designed into the

Key Design Principles

- A development which respects the existing character of the area being of an appropriate scale and density.
- Up to 50 dwellings at a net density of 31 dwellings per hectare.
- Vehicle access off Widney Manor Road at the south-west corner of the site.
- Retention of existing trees and hedgerow along western boundary with Widney Manor Road.
- Large area of site retained as public open space, providing opportunities for tree planting and enhanced biodiversity.
- Buffer planting to filter views of the development from the south.
- Secure boundary along northern edge defined by rear gardens of new properties. Tree planting in rear gardens of properties to preserve visual amenity of existing houses along Lovelace Avenue.
- New footpath links connecting houses to existing Public Rights of Way along the southern and eastern boundaries.
- Direct footpath connections onto Widney Manor Road from within the site.
- Integration of sustainable urban drainage systems into the landscape strategy.



Figure 05.02: Illustrative Masterplan

central portion of the site to ensure the green and open nature of the views from this aspect are maintained and in some instances enhanced. Buffer planting will assist in filtering views of the development from the wider countryside.

Housing Mix

At 2.79ha (gross), the site is large enough to accommodate a range of different house types and sizes to cater for local demand.

The illustrative masterplan shows an indicative housing mix which includes detached houses, semis and townhouses of various sizes including 2, 3, 4 and 5 bed units.

The site would also be an appropriate location for smaller 1 bed apartments or elderly housing, benefitting from excellent accessibility to public transport and a range of local services and facilities.

Surface and Foul Water Drainage

In accordance with the Solihull Metropolitan Borough Council Local Plan Policy 11, the development will aim to reduce post-development surface water run-off to greenfield rates.

Initial investigations have revealed that infiltration techniques are unlikely to be a suitable methodology for the disposal of surface waters. The preferred surface water disposal option is therefore likely to be to discharge to River Blythe with peak discharge rates limited to greenfield rates.

In order to improve the water quality of the discharges from the site it will be necessary to incorporate a robust primary treatment system to remove silt and sediment from surface water runoff entering the river. Appropriate systems may include: rainwater harvesting; swale/vegetated channels; bio-retention systems; permeable pavements; detention basins; ponds; and wetlands.

The illustrative masterplan shows an indicative Sustainable Urban Drainage System (SuDs) that works with the natural topography of the site. The masterplan shows two balancing ponds/detention basins located within public open space towards the south-west corner.

Foul water from the proposed residential development would be

drained by a separate foulwater drainage system. This foul water drainage system would discharge to the 225m sewer in Widney Manor Road or the 975m sewer which runs along the southern boundary of the site.

Summary

The illustrative masterplan presented here clearly demonstrates that a high quality residential development can be delivered on the site. The masterplan illustrates a development that not only respects existing site constraints, but promotes accessibility by non-car modes, preserves and enhances existing natural assets and is sympathetic to both the landscape setting and character of the existing built environment.

Apreliminary access design has been prepared and this demonstrates that an access arrangement can be provided that accords with the relevant design standards. Residential development of an appropriate scale would not have any significant impact on the local highway network.

6. LANDSCAPE & VISUAL IMPACT

A LANDSCAPE AND VISUAL APPRAISAL HAS BEEN CARRIED OUT TO ANALYSE THE POTENTIAL EFFECTS THAT A PROPOSED RESIDENTIAL DEVELOPMENT MAY HAVE ON THE SURROUNDING LANDSCAPE AND VISUAL AMENITY

The study provides recommendations that will minimise any adverse visual effects of the development that will ensure optimum integration of the site within the wider landscape setting. The study appraises the existing landscape in terms of value, condition and considers the relationship of the site with the adjacent settlement.

The study finds that the proposed development does not erode the quality of the existing landscape and it could potentially provide an overall benefit by enhancing the site boundaries with the introduction of appropriate landscape planting.

It is recommended that a robust buffer of planting is introduced along boundaries adjacent to the rear gardens of the properties on Lovelace Avenue and to the southern portion of the site to help screen views from the valley side to the south of the M42.

The overall aim of the landscape strategy is to provide an appropriate and attractive landscape setting for the development that provides an attractive settlement edge to the Widney Manor area of Solihull and ensures the development is successfully integrated into the adjacent countryside.

The agricultural boundaries with associated trees and hedgerows will be retained and enhanced with new tree and hedgerow planting to form part of the structure planting and public open space provision.

Where development will lead to loss of hedgerow species along Widney Manor Road, appropriate replacement species will be included within the landscape planting proposals therefore providing the potential to mitigate any identified loss.

The site parameter plan illustrates that a large area of public open space and retained agricultural land has been designed into the southern portion of the site. This will ensure the green and open

nature of the views from this aspect are maintained and in some instances enhanced.

There is potential to provide avenue trees and further landscape buffers to the southern edge to help to visually integrate the development when viewed from the footpath network to the south.

The Solihull Borough Landscape Character Assessment (SBLCA) describes the site as being within Landscape Character Area 1 – Solihull Fringe (sub section LCA 1B). Key Characteristics of the character area:

- Medium to large scale fields, some containing large agricultural buildings particularly within the southern extent of the area.
- Good hedgerow structure with hedgerow trees of varying condition. Some areas have bracken hedgerows as seen around Gate Lane.
- Pockets of coppiced woodlands are scattered across the sub-area.
- Northern extent has an extensive amount of ribbon development giving rise to a sub-urban feel.
- Noise from the motorway and general road traffic affects the tranquillity in the sub-area.

Visual Effects

The potential visual effects of the impact caused by the proposed development on visual receptors, including on the residential amenity of the adjacent dwellings that are on Widney Manor Road and Lovelace Avenue have been assessed and are summarised in the table opposite.

Potential Mitigation Measures

The overall aim of the landscape strategy is to provide an appropriate and attractive landscape setting for the development that provides an attractive settlement edge to the Widney Manor area of Solihull and ensures the development is successfully integrated into the adjacent countryside.

- Retention of the existing hedgerow and tree planting along the boundaries of site.
- Existing hedgerow gaps to be in-filled with native species of planting to enhance and increase the biodiversity value and green infrastructure network.
- Robust buffer of planting along boundaries adjacent to the rear gardens of the properties on Lovelace Avenue.
- Replacement planting to mitigate loss of any hedgerows removed to provide access to the site.
- Large area of public open space and green infrastructure has been designed into the southern portion of the site to ensure the green and open nature of the views from this aspect are maintained and in some instances enhanced.

The locations of the considered visual receptors have been selected with the criteria that all views are taken from positions that have general public access and a clear view of the site.

Summary of Visual Effects

The assessment of the potential effects on the landscape concludes that there will be an immediate change in the character of the existing site as housing is introduced. There is potential for any identified adverse effects being reduced over time as the planting and landscape framework within the site matures. The setting of the site will benefit from the introduced planting within the development and especially around the perimeter after the introduced planting within the site has matured. The proposed development is likely to have a minor to imperceptible effect on the broad and local landscape character. However, the landscape proposals are considered to be potentially beneficial as they offer the opportunity to enhance the proposed extended settlement edge and reflect the adjacent landscape character of the L1B Solihull Fringe Character Area.



View from the railway station car park looking to the northeast across the railway line.

Visual Receptor	Views	Sensitivity to Change	Predicted Residual Visual Effects
Widney Manor Road	The road is well vegetated on the proposed development side to the east. Glimpsed views of the development may be experienced in places.	Low (Vehicles) Pedestrians/Cyclists (Medium/Low)	Minor Moderate
Residential Properties on Widney Manor Road	Filtered views from lower rooms through the existing field boundary on the western edge of the proposed development. Long distance views across the countryside from the upper storey bedrooms	Medium/high (non principal rooms e.g kitchens) Medium (bedrooms)	Moderate
Widney Manor Road/ Smiths Lane	limited views are experienced through gaps in roadside hedges as field vegetation screens most views further south than Smiths Lane.	Low (Vehicles) Pedestrians/Cyclists (Medium/Low)	Minor
Views from the M42	Partial visibility of the site may be experienced from the motorway however little to no effects will arise from the development due to the high speeds of motorway traffic.	Low	Negligible
Lovelace Avenue	Views from some private rear gardens or upper rear bedrooms/non-principal rooms	Medium/high (non principal rooms e.g kitchens) Medium (bedrooms)	Minor to Moderate
Public Rights of Way	The site is generally visible from parts of the Public Rights of Way (PRoW) network within the site and also from the footpaths that travel south over the M42 and beyond Smiths Lane. • Views to the site from the public footpaths further south west do not experience views of the site due to the field vegetation that aligns the railway track between Widney Manor and Dorridge stations	Medium to High The recreational viewpoints in the south are located in the Green Belt and are considered high in terms of sensitivity	Moderate
Green Belt	The site is currently within the edge of the Green Belt and will be released if it becomes allocated. The proposed planting to the southern boundary will provide mitigation and offset adverse effects.	High	Moderate



View from the public footpath in the north east corner of the site.



View looking northwards towards the development site from the footpath located to the south of the M42 travelling towards Smiths Lane.



View from the footbridge that travels across the M42 and links Lovelace Avenue with Smiths Lane.

Figure 06.01: Viewpoints from the Visual Appraisal

7. CONCLUSIONS

THIS VISION STATEMENT HAS BEEN PREPARED ON BEHALF OF THE GOVERNORS OF THE SCHOOLS OF KING EDWARD VI IN BIRMINGHAM TO SUPPORT THE ALLOCATION OF THE SUBJECT SITE FOR HOUSING. THIS STATEMENT DEMONSTRATES THE VIABILITY, DELIVERABILITY AND SUITABILITY OF THE SITE FOR NEW RESIDENTIAL DEVELOPMENT.

This Vision document outlines the intention and commitment of our client to deliver a high quality residential development of up to 50 dwellings on land at Widney Manor Road, Solihull.

This document has demonstrated that the site is a sustainable location for new housing, with good access by non-car modes of transport and benefitting from good accessibility to a range of local services and facilities including schools, shops, leisure and community facilities.

This document has identified constraints and opportunities that need to be considered in any development of the site and has demonstrated that there are no significant technical barriers to development of an appropriate scale and form.

An illustrative masterplan has been presented that demonstrates how a high quality residential development can be delivered on the site in a way that has regard to the site's context, respects the character of the surrounding area and retains existing natural features.

In summary, the site is considered to present a number of advantages as a location for new housing. The site:

- Is uniquely located along an important route into the town from the south, enabling the creation of a high quality gateway;
- Is large enough to make an important contribution to meeting Solihull's housing requirements, providing an attractive setting for high quality homes that would appeal to a broad market;
- Is surrounded by established areas of housing, including directly opposite the site, and therefore its development for housing offers the potential to strengthen the residential character of the local area.
- Benefits from partial screening from key visual receptors by existing vegetation around the edges of the site, minimising any

impact on the setting or character of the surrounding landscape;

- Can be readily accessed from the existing road network via a single priority junction at the south-west corner of the site;
- Benefits from good accessibility to a range of services and facilities;
- Is accessible by public transport, walking and cycling; and
- Has limited potential to support protected and notable fauna, is not designated as a site for nature conservation and does not contain any protected or notable trees.

In light of above, SMBC are encouraged to give due consideration to including the site at Widney Manor Road as a preferred option for accommodating new residential development in the new Local Plan.



Designed & produced by:

e*SCAPE
u r b a n i s t s



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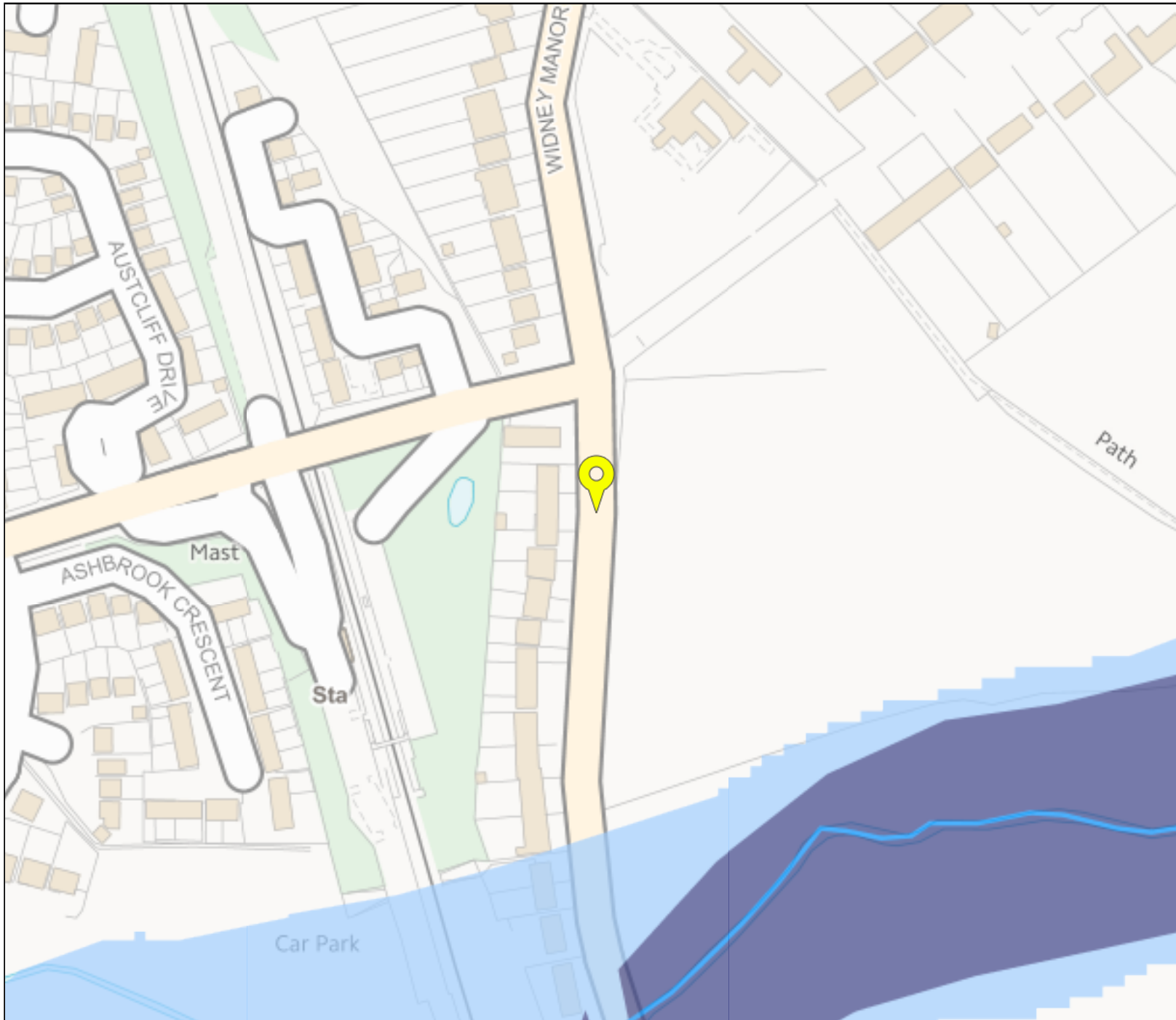


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Appendix III
EA Flood Map Extract











Flood map for planning

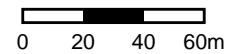
Your reference
SKE, Solihull

Location (easting/northing)
415565/277635

Scale
1:2500

Created
14 Dec 2020 14:54

-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



Appendix IV

HSE Pre-Application Response

Advice : HSL-170411105606-509 DO NOT ADVISE AGAINST

Your Ref: BMT2334

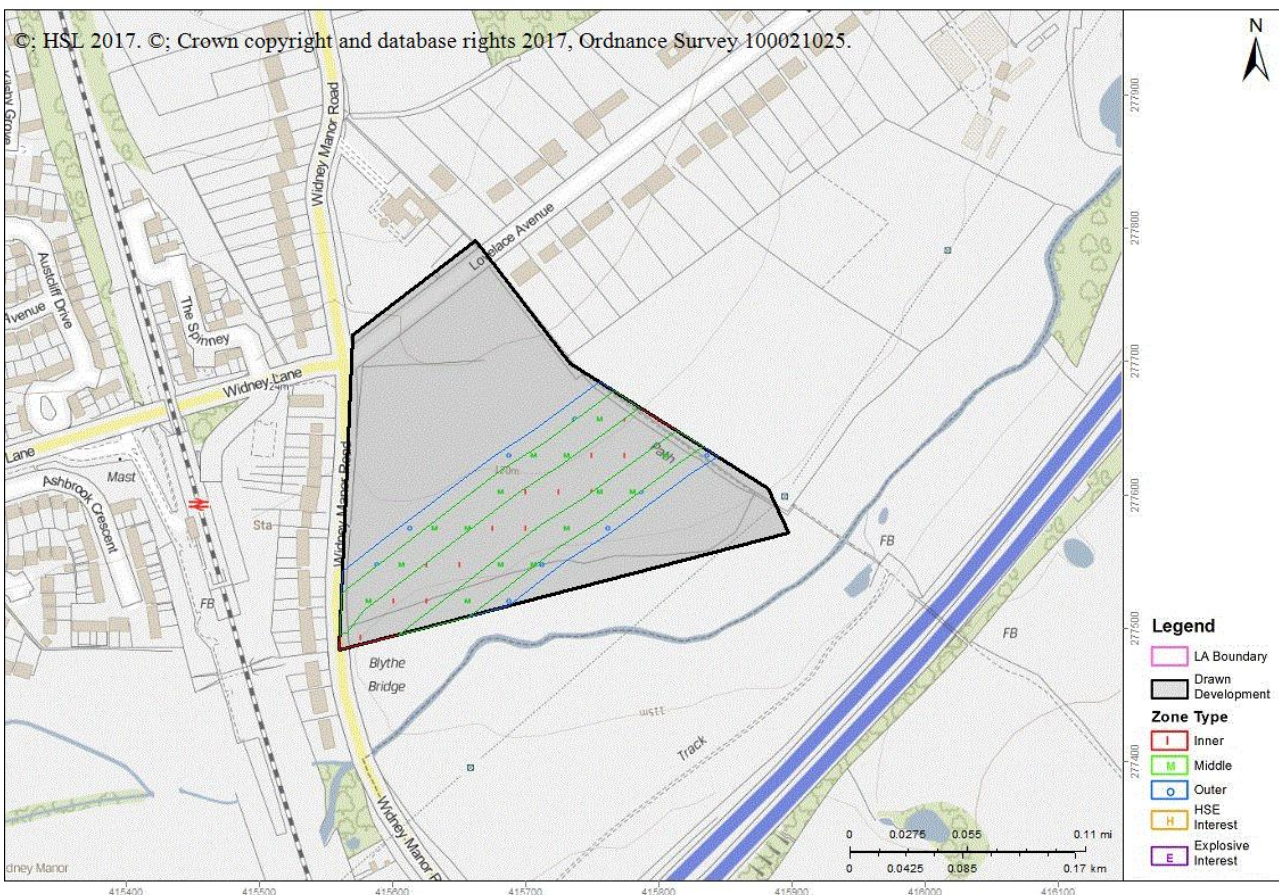
Development Name: Land off Widney Manor Farm, Solihull

Comments: I would be most grateful if you could provide the inner, middle and outer stand off zones for the high pressure gas main within the boundary of the site and provide guidance as to the potential development of the land, which is anticipated to comprise a total of 75 residential units. Many thanks and best regards, Armani Akbar-Roy

Land Use Planning Consultation with Health and Safety Executive [Town and Country Planning (Development Management Procedure) (England) Order 2015, Town and Country Planning (Development Management Procedure) (Wales) Order 2012, or Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013]

The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the Consultation Distance of Major Hazard Sites/ pipelines. This consultation, which is for such a development and is within at least one Consultation Distance, has been considered using HSE's planning advice web app, based on the details input on behalf of BWB Consulting Limited.

HSE's Advice: Do Not Advise Against, consequently, HSE does not advise, on safety grounds, against the granting of planning permission in this case.

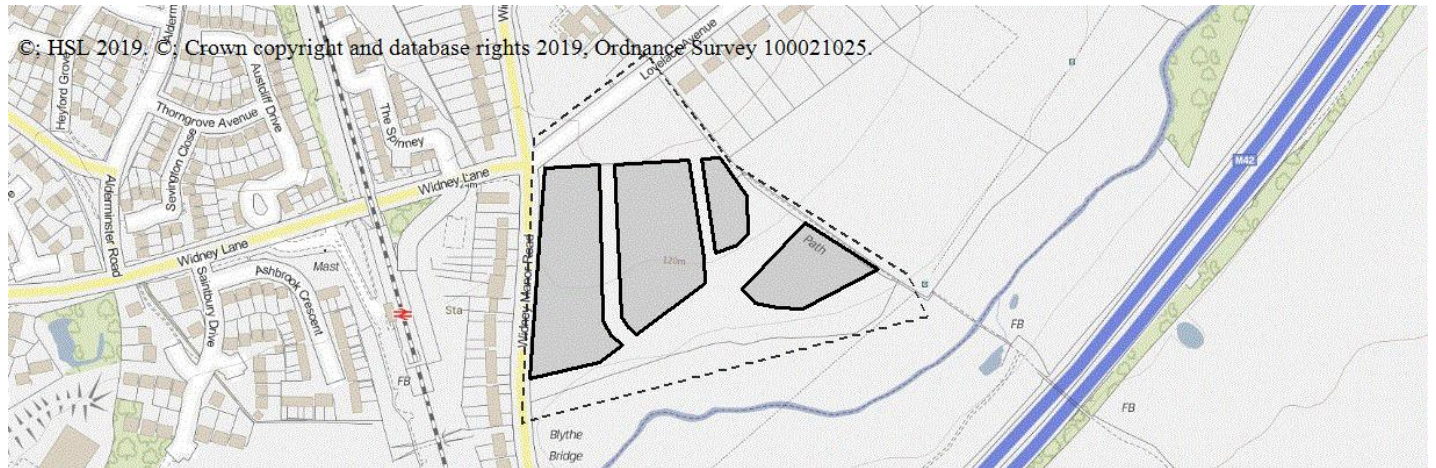


Commercial In Confidence

Breakdown:

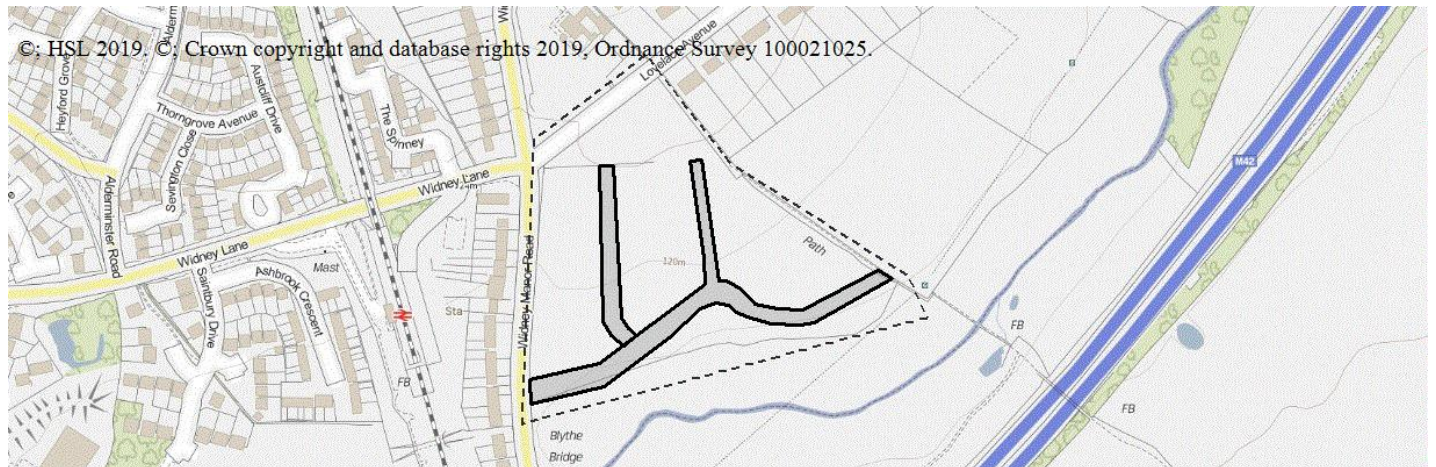
Housing DAA

How many dwelling units are there (that lie partly or wholly within a consultation distance)? 3 to 30 inclusive
Is the dwelling unit density greater than 40 units per hectare? No



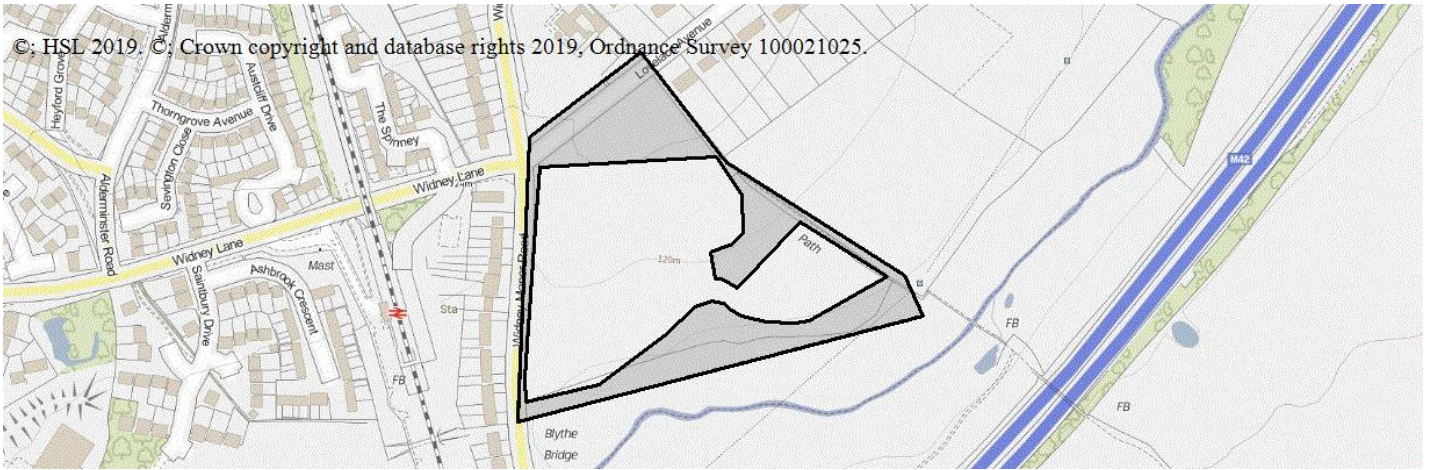
Transport Links DAA

Is the transport link a motorway or a dual carriageway? No



Landscaping DAA

There are no questions for landscaping



Pipelines

7167_1437 Cadent Gas Ltd

As the proposed development is within the Consultation Distance of a major hazard pipeline you should consider contacting the pipeline operator before deciding the case. There are two particular reasons for this:

- The operator may have a legal interest (easement, wayleave etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline.
- The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds.

HSE's advice is based on the situation as currently exists, our advice in this case will not be altered by the outcome of any consultation you may have with the pipeline operator.

This advice report has been generated using information supplied by Armani Akbar-Roy at BWB Consulting Limited on 08 February 2019.


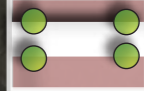

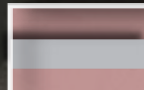



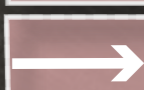

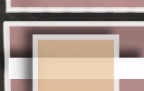




Note that any changes in the information concerning this development would require it to be re-submitted.

Appendix V


Updated Parameters Plan

Accommodation Schedule:
 Gross Site Area: 3.99ha
 Net Developable Area: 2.5ha
 Number of Homes: 79
 Public Open Space: 1.49ha
 Net Density: 32 units/ha
 Gross Density: 19 units/ha

Key

	Application Boundary		Avenue
	Green Infrastructure		Street
	Retained Trees		Lane
	Proposed Trees (Indicative)		Shared Drive
	Development Parcels		Squares
	Focal Buildings		Primary Footpath Links
	Building Orientation		Gateway



 n*ORTH

0m 10m 20m 30m 40m 50m 60m

Scale 1:1250 (@ A3)

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Project Title
Widney Manor Road, Solihull

e*SCAPE Job No.
017-004

Client
Schools of King Edward VI

Drawing Number Revision
017-004-003 REV -

Drawing Title
Parameters Plan

Scale Date
1:1,250 @ A3 May '17

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