

SOLIHULL LOCAL PLAN REVIEW – FURTHER CONSULTATION SPRING 2019

Key section of CPRE Warwickshire Response to Solihull MBC, March 2019

Subject: what is the projected growth of household numbers in Solihull during Plan Period of Local Plan Review.

Response of March 2019 notes what the most recent ONS projections for household growth in Solihull show for the real housing need from increased population, compared with the proposed additional number of houses that the Plan proposes (which is much higher).

In the section ‘Housing Market Area’ (para 49-52), it is stated (para 49):

The Draft Local Plan included a commitment to accommodate 2,000 dwellings from the shortfall that is occurring in the wider Housing Market Area. Using the same contribution, the overall housing requirement to be addressed in the Local Plan Review would, using the standard methodology outlined above, be 15,039 dwellings over the period 2018 to 2035, or 885 dwellings per year.

There is no justification for this commitment to take 2,000 dwellings from the wider HMA, because that conflicts with the principles set out in NPPF para 11 and the Green Belt and Knowle Conservation Area constraints.

We are not aware that the Council has reached an agreement with adjoining Councils regarding its contribution to the HMA shortfall.

The rate of housing delivery suggested in the Consultation text, 885 dwellings/year for 17 years 2018-2035, is far above the highest number of completions in the Borough in any one year except in one year, 2005. It is double the rate of house completions that have been recorded over the last 10 years (2008-2018). It is also above the ‘cap’ that would apply if the standard method were to be used to calculate Solihull’s own local housing need.

The proposed housing policy and projected housing requirement of 15,000 over 17 years is not sound, because it is not deliverable from past evidence. Such a high rate of delivery over the life of the Local Plan could never be achieved – it is double the past rate, the housebuilding industry does not have the resources to built at such a rate, it takes no account of economic cycles or the projected economic downturn of the next few years.

The Council can instead use the 2016-based household projections, which are independently published by the ONS and indicate the most likely household growth in the Borough given the many constraints. This is an annual growth of 550 households, or 9,350 over 17 years 2018-2035.

That level of housing provision is largely achievable within the constraints of the Green Belt and the Designated Heritage Asset of Knowle Village Conservation Area. The Solihull Housing Land Supply table (Supplementary Consultation booklet Jan 2019, page 13) shows that housing supply excluding ‘Allocated Sites’ (6,310 dwellings) plus UK Central Hub (2,500 dwellings) is 7,355.

(The ‘minus 400’ or 10% reduction applied to sites with planning permission and SLP 2013 allocated sites is not justified. Experience in the Borough in recent decades is that generally the number of houses given planning permission at detailed application stage is above the Local Plan number, not below it.)

Therefore there is capacity for 13 years of the Plan period, up to 2031, without needing new allocated sites which are now Green Belt, if the most recent household projections for the Borough are used.

Solihull Housing Land Supply 2018-2035 (as of 1st April 2018)

Table in January 2019 Consultation booklet

<i>Source</i>	<i>Estimated Capacity</i>
1 Sites with planning permission (started)	1,106
2 Sites with planning permission (not started)	2,199
3 Sites identified in land availability assessments	364
4 Sites identified in the brownfield land register (BLR)	200
5 Solihull Local Plan allocations without planning permission at 1 April 2018	1,236
6 Less a 10% to sites with planning permission (not started), sites identified in land availability assessments and SLP sites	-400
7 Windfall housing land supply (2018-2033)	2,250
8 UK Central Hub Area	2,500
9 Allocated Sites	6,310
Total Estimated Capacity (rows 1-7)	15,765

Housing Land Supply: Small Sites

The Consultation document at para 56-57 addresses the issue of ‘Small Sites’ but there is no consultation question attached. In the previous consultation (Dec 2016-Feb 2017) there was significant comment that the Local Plan is relying on large housing allocations and contains very few small sites, despite national policy to encourage small sites which can be developed with short lead-time and quickly, compared to the slow rate at which large sites reach detailed permission stage and then are built out. NPPF 2018 para 68 says: ‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly’.

Para 56-57 seek to justify the Local Plan’s preference for large sites by asserting that national policy is complied with if only 1500 houses are proposed on small sites below 1 ha. It says that since windfall sites (2250 dw) and brownfield-register sites (400 dw) would be small sites, ‘these sources will comfortably exceed the 10% requirement for small sites’.

NPPF 2018 para 68(a) in fact states that planning authorities should identify land to accommodate ‘at least 10%’ on sites no larger than 1 ha. But this does not mean that the remainder can therefore be proposed on large site allocations. There are many sites between 1 ha and 5 ha which are ‘small or medium’ and would not be large allocated sites. Many were advanced by developer or property interests at the call-for-sites stage but have not been accepted.

There are good reasons to maximise the number of small and medium sites:

- They are usually sustainable locations within the existing urban areas
 - They are accessible – served by existing public transport
 - They are near existing services – schools, shops, community facilities
 - Small and medium sites in the urban areas reduce or remove the need to change Green Belt boundaries and remove land from the Green Belt.
- The large sites proposed in the Local Plan can only be ‘greenfield’ as there are no more old industrial areas to redevelop; hence cause loss of Green Belt.

The Plan’s bias in favour of large, greenfield, housing sites remains. It needs to be changed and the focus changed to (a) sites below 1 ha and (b) sites between 1 ha and 5 ha (small-to-medium).