

Our Ref: 6074 DSLPRSC GC

Policy and Delivery  
Managed Growth and Communities Directorate  
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13<sup>th</sup> March 2019

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Dear Sir/Madam,

**Representations to the Draft Solihull Local Plan Review Supplementary Consultation: Proposed Allocated Housing Site 10 West of Meriden (Site Refs. 119 and 137 in the Site Assessments)**

We write on behalf of our Client who owns part of Proposed Allocated Housing Site 10 West of Meriden.

This letter is submitted in response to the current consultation on the Draft Solihull Local Plan Review Supplementary Consultation (DSLPRSC), January 2019. Representations have previously been submitted: in February 2017 in response to the draft SLP; and in January 2016 in response to the Scope, Issues and Options consultation.

**Our Client welcomes and fully SUPPORTS the proposed allocation of Proposed Allocated Housing Site 10 West of Meriden, for residential development, in the DSLPRSC. The key question raised in the DSLPRSC is Question 30. The following sets out our Client's response, in full support of this continued housing allocation.**

## Summary of representations and objections

1. Our Client welcomes the opportunity to comment on the DSLPRSC. In particular within this letter, we:
  - respond to Question 30 of the DSLPRSC, to confirm our Client's support for the continued Proposed Allocation of Housing Site Allocation 10 West of

Meriden;

- contend that the need for Site 10 and other additional sites to come forward for housing is imperative. There is clearly a high demand for housing. There is potential for some sites in the DSLPRSC not to be brought forward and also for the minimum housing requirement to be increased in response to the shortfall across the Housing Market Area, which compounds the need for the continued allocation of sustainable sites;
- support the proposed distribution of development set out in the DLPSC that seeks to distribute housing both within the urban area of the borough, and disperse across a number of identified settlements, including Meriden;
- support the decision to review Green Belt boundaries to accommodate the identified growth, including the Green Belt around Meriden, identified as a settlement that can accommodate housing growth;
- support the Council's confirmation that Site 10 meets all of the Council's Site Selection criteria and national criteria for prioritising site selection;
- agree with the DSLPRSC Site Assessments January 2019 that Site 10 forms a logical western extension to Meriden, is in a low performing area of Green Belt, is partly brownfield, has no limiting constraints to development, has a high level of accessibility, is deliverable, is in a settlement identified for limited expansion, and is well related to the centre of the village;
- note that the August 2018 Housing Needs Survey Report in the Parish found that there is a need for forty-five new homes for people with a defined local connection, and in particular the provision of affordable one and two bed homes and accommodation to meet the needs of older people. It is contended that the development of Housing Site 10 will go some way towards meeting that recently identified need;
- confirm that our Client's site can come forward for development in the first phase of the Plan period;
- confirm that notwithstanding the Proposed Allocation of Housing Site Allocation 10 West of Meriden, in the unlikely event that parts of Site 10 were to be developed in parcels, Site Ref. 119 forms a logical housing site in its own right, having willing owners and clearly defensible Green Belt boundaries including a long road frontage. The proposed layout in the DSLPRC 'Solihull Local Plan Review Draft Concept Masterplans. January 2019' page 74, provides evidence of this;
- formally request that Section 10 of the DSLPRSC: Site Assessments January 2019, Site Reference 119, be corrected to remove reference to 'Contaminated land on greater part of site' as there is no evidence of this 'Soft Constraint' on the site, as has been repeatedly raised in previous submissions to the Council by our Client;
- formally request that Section 10 of the DSLPRSC: Site Assessments January 2019, Site Reference 119, be corrected to include reference in Greenfield/Brownfield to the fact that part of the site is brownfield. The site includes an area with a Certificate of Lawfulness for use of part of the site for caravan storage. In addition, there is also a building on this same part of the site; and
- formally request that Section 10 of the DSLPRSC: Site Assessments January

2019, Site Reference 119, be corrected to remove reference to the northeast boundary of Site Ref. 119 and the southwest boundary of Site Ref. 137 being indefensible boundaries to the Green Belt: this boundary includes the curtilage and buildings of The Firs housing development and mature trees and hedgerows, some of which are protected by Tree Preservation Order.

The detailed case for the inclusion of our Client's site, responses to Question 30 in the consultation, and the context for the representation, is set out in detail below.

## Response to Question 30 in the DSLPRC

2. Question 30 requests commentary on whether it is considered that Site 10 west of Meriden should be included as an allocated site. It also requests comments on the draft masterplan for the site.
3. Representations in support of the site's allocation have previously been submitted in January 2016, in response to the Scope, Issues and Options consultation. The land was promoted for consideration in the Strategic Housing and Economic Land Availability Assessment (SHELAA) Review 'Call for Sites' and in February 2017 in response to the draft SLPR.
4. Our Client has the following comments to make on the current DSLPRSC.

### The Site

5. Our Client's land comprises the western part of the Proposed Housing Allocation 10 West of Meriden. His ownership extends to approximately a third of the site, the remainder is owned by two landowners willing to bring forward the development of the site within the first phase of the Plan period.
6. Proposed Housing Allocation Site 10 lies adjacent to the defined settlement boundary of Meriden. According to Environment Agency flood risk maps it does not lie in an area liable to the risk of flooding. The site is bounded by residential development to the south, southeast, southwest and northeast. Birmingham Road (B4104), with a 30mph speed limit in operation, bounds the site to the southwest and the three arm roundabout with Maxstoke Lane lies to the northwest. Residential development lies on the opposite side of Birmingham Road.
7. The site is well screened from the road by mature trees and hedges. The site is largely open in character although there are a number of trees, some of which are subject to Tree Preservation Orders. The site has clear defensible permanent physical boundaries in the form of Birmingham Road, Maxstoke Lane, and existing mature boundary planting, as advised by paragraph 139 of the NPPF.

8. The site is ideally placed to access a range of local service, retail and community facilities, as well as having bus stops immediately adjacent to the site on the Birmingham Road. The centre is served by 3 bus services, the X1 Birmingham to Coventry, 82 Solihull to Coventry and 89 Solihull to Coventry (all services are hourly during the day). Buses take less than half an hour to reach Solihull Town Centre while Coventry City Centre takes less than 40 minutes on the bus. Both centres offer an extensive range of services and facilities.
9. Meriden itself has a good selection of local shops within easy walking distance of the site. To the southeast in the centre of the village on The Green, there are shops and services including a pharmacy, a Spar convenience store, a Co-op food store, fish and chip shop, a tea room, hairdressers, a gift shop and library. Meriden also has pubs, hotel, a post office, Primary School and Pertemps Head Office. A large park with play equipment and playing fields is within a five minute walk from the site on Hampton Lane.
10. It is clear therefore that the site is in a very sustainable location close to existing residential development and range of community facilities and services.

### Planning Policies

11. Relevant planning policies in support of the continued allocation of Site 10 include: Paragraph 78 of the NPPF, which recognises the need to promote sustainable development in rural areas, suggesting that housing should be located where it will enhance or maintain the vitality of rural communities. Clearly, as set out in the Council's own 'Site Assessments', Meriden village is identified as suitable for limited expansion and the site is well related to the centre of the village.
12. Planning policy - the DSLPRSC, National Planning Policy Framework (NPPF) and the Strategic Growth Study (SGS) - also prioritise the use of brownfield land in sustainable locations, with the NPPF at Paragraph 117 stating that strategic policies should set out a clear strategy for accommodating objectively assessed housing needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Paragraph 118, part d) emphasises that policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
13. Paragraph 139 (f) of the NPPF confirms that, in defining Green Belt boundaries, plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The drawing of the Green Belt boundary to accommodate Proposed Site 10 would thus be in accordance with the provision of the NPPF.

## Commentary on the Housing Requirement

14. Whilst our Client fully supports the Council's decision to calculate the housing requirement using the Standard Methodology based on the 2014 household projections, it is noted that there is still no signed Statement of Common Ground, contrary to the requirements of the NPPF, and that the proposed contribution towards the cross-boundary shortfall remains at 2,000 dwellings, despite new evidence highlighting the increased scale of the Housing Market Area's (HMA) unmet need. It is imperative that Site 10 and other additional sites to come forward for housing. The need for the continued allocation of sustainable sites such as Site 10 is clear: there is a very high demand for housing in the Borough, which will inevitably increase.
15. It is considered that insufficient deliverable residential site allocations have been identified which comply with the Council's Site Selection criteria and national policy recommendations. The need for the continued allocation of sustainable sites such as Site 10 is clear: there is a very high demand for housing, which may not be met by all of the proposed allocations. This demand is also likely to increase.
16. A number of the 'green' sites highlighted by the council as preferred development allocations have significant question marks over their deliverability, compliance with national policy and/or impact on sustainable communities, e.g. because there are existing employment or community uses on the sites which would require the finding of suitable alternatives. It is considered that this calls into question deliverability of approximately 1,060 dwellings. Once again, this has the implication that those sites which are available for development must be promoted/ allocated for development, as is the case with Site 10 West of Meriden, which is a developable and deliverable site, and will make a valuable contribution towards delivering market and affordable housing to meet this need.

## Justification for Proposed Housing Allocation Site 10

17. It is not proposed to repeat earlier submissions made on behalf of our Client in respect of the Proposed Allocation of Housing Site 10. Clearly the site is an allocation and meets all of the Council's Site Selection criteria, as well as national criteria for site selection. It fulfills the need for sustainable development emphasised in the NPPF, February 2019, and Planning Practice Guidance (PPG) and within the previous plan review was allocated for development (affordable housing).
18. In response to Question 30: Justification for continued proposed Housing Site Allocation 10, our Client supports Proposed Housing Allocation 10, a developable and deliverable site for housing which will make a valuable contribution towards delivering market and affordable housing to meet the OAHN.
19. An extension of Meriden westwards fulfills local and national planning policy objectives of directing development towards the most sustainable sites where there would be least adverse impact on the Green Belt, landscape, environment, ecological assets,

historical assets, and health and well-being. The continued allocation of Proposed Housing Allocation Site 10 will ensure that any adverse impacts of developing the site can be successfully mitigated and any need for additional infrastructure accommodated within the site and/or through financial contributions.

20. The recent Housing Needs Survey Report for Meriden Parish Council August 2018<sup>1</sup>, undertaken as part of the Neighbourhood Plan process, found that there is a need for forty-five new homes for people with a defined local connection, and in particular the provision of affordable one and two bed homes and accommodation to meet the needs of older people. The development of Housing Site 10 will go some way towards meeting that identified need.
21. Our Client's site makes a very limited contribution towards the purposes of including land within the Green Belt (both sites are in a lower performing parcel overall with a combined score of 5, compared to other proposed allocations).
22. The site is in a sustainable location, more so than many sites proposed for allocation; it lies within a landscape character area which is capable of accommodating a limited amount of appropriately designed and laid out development.
23. Existing boundaries to the site are defensible, in line with the NPPF paragraph 139(d). There are clear physical defensible boundaries, including roads, watercourses, the boundary of existing residential curtilages, hedging and trees.
24. In the unlikely event that Site Ref. 119 were to come forward in isolation from Site Ref. 137, Site 119 has clearly defensible boundaries in its own right: it benefits from a long road frontage to Birmingham Road to the southwest and northwest, new housing development to the southeast, The Firs development to part of the northeast boundary and mature trees and hedgerows to the remainder of the northeast boundary. Some of the trees on the site are protected by Tree Preservation Orders, which further reinforces the defensibility of the site's boundaries. It is also located opposite frontage development and clearly 'rounds off' the village to the west. The existing trees and hedgerows to the boundaries can be retained to help provide a natural screen to the development.
25. Similarly Site Ref. 137 bounds Maxstoke Lane to the east and mature trees and hedging to the watercourse to the northeast (which also forms the administrative boundary of Solihull MBC with North Warwickshire Borough Council).
26. In terms of 'contaminated land/ landfill site', our Client is unclear where this suggested constraint has its origins, as it was not mentioned in the 2012 SHLAA, nor in the Council's consideration of the allocation of the site in previous consultation documents. There is no reference to any landfill site information relating to the site on the Environment Agency's website. We have raised concern over this error in previous submissions to the Local Plan Review. Our Client contends that this information is misleading and formally requests that either detailed evidence to substantiate this claim is provided or the reference is removed from the forthcoming submission version of the



Solihull Local Plan Review and the supporting evidence reports.

27. Site Reference 119 should also be corrected to confirm part of the site is brownfield. 'Existing Uses' on the site are referred to in the DSLPRSC: Site Assessments January 2019 under 'soft constraints'. The site includes an area with a Certificate of Lawfulness for use of part of the site for caravan storage under permission ref. 2006/1082 (see enclosure plus aerial photographs). In addition, there is also a building on this same part of the site, as evidenced in the enclosed photograph at and aerial photographs). The site is clearly partly previously developed land and should be referenced as such. Development of this part of the site meets planning policy requirements of the DSLPRSC, the NPPF and the SGS by prioritising the use of brownfield land such as this in a sustainable location, with the NPPF at Paragraph 117 stating that strategic policies should set out a clear strategy for accommodating objectively assessed housing needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. The brownfield status of part of the site is therefore material to its continued allocation of the site for housing, in accordance with the national planning policy. Again, we formally request that this factual error is correct in the forthcoming submission version of the Solihull Local Plan Review and support evidence reports.
28. The site is within easy reach of a range of retail, community and public transport facilities. Our Client's site could be brought forward within the first 5 years of the plan period with contributions towards: the shortfall in the 5 year housing land supply; infrastructure through Community Infrastructure Levy (CIL) payments and S106 agreements; and the creation of mixed tenure which would meet the identified need for smaller units, affordable and specialist housing, most recently identified in the Housing Needs Survey of 2018.
29. There are no known legal or physical constraints which would prevent the site coming forward for development within 5 years. It has no site specific designations.
30. The 'Masterplanning' exercise undertaken as part of the Local Plan process demonstrates how the site could be developed and the site could deliver approximately 100 dwellings within the first 5 years of the plan period. There are no viability issues and the site can deliver the required infrastructure.
31. Development here represents a logical sustainable extension to Meriden, in line with local and national planning policy objectives, and is fully supported by the independent assessments commissioned by the Council.

## Conclusions

32. Our Client welcomes and fully supports the continued proposed allocation of land West of Meriden for residential development, forming part of Proposed Housing Allocation Site 10 in the DSLPRSC, January 2019. Development here fully meets the Council's Site Selection criteria and meets national policy requirements for sustainable

development.

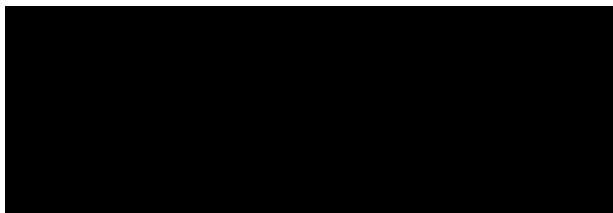
33. It is entirely appropriate for Meriden to be extended westwards to allow for residential development. The site is a logical extension to the settlement in a sustainable location. Site 10 contributes less to the purposes of including land within the Green Belt than many of the other Proposed Housing Allocations in the DSLPRSC.
34. Proposed Housing Allocation 10 has clear defensible strong and enduring Green Belt boundaries delineated by Birmingham Road, Maxstoke Road and mature boundary landscaping, meeting the requirements of the NPPF paragraph 139. Development here would not result in the coalescence of settlements, as required by the NPPF.
35. There are no known legal or physical constraints which would prevent our Client's site coming forward for development. Contrary to the commentary in the DSLPRSC: Site Assessments, Site Ref. 119 is not contaminated and this reference should be removed from documents going forward to avoid any confusion. Similarly part of the site is brownfield and the site assessments should be amended accordingly.
36. The landowners of Site 10 are willing and the site could be brought forward for development within the first phase of the plan period.
37. Our Client's site, within Proposed Housing Allocation Site 10:
  - is one of the most accessible potential housing sites;
  - does not include any heritage assets, football pitches and community facilities;
  - is not used for agriculture so there will be no loss of land which is of high agricultural value which is a potential concern in the sustainability appraisal;
  - is bounded on three sides by existing development making it a logical location for an extension and has defensible boundaries to the remaining northeast boundary;
  - makes a low to moderate contribution towards the purposes of including land within the Green Belt;
  - has no known constraints to its development; and
  - the masterplanning exercise demonstrates how the site could be developed in compliance with planning policies.
38. Development on our Client's site would make a short-term impact on the shortfall in housing land supply and affordable/starter home need with housing deliverable within the first 5 years by willing landowners. It could provide a mixed tenure development with a mix of dwelling sizes to meet local needs for smaller dwellings and specialist homes in line with national policy objectives and meeting the need established in the recent Housing Needs Survey.

We should be grateful if you would acknowledge receipt of this letter and confirm that the sites will be included for consideration in the preparation of the submission version of the Solihull Local Plan Review.



We look forward to hearing from you|

Yours faithfully,



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Enclosures

Site Plan with the land West of Meriden outlined in red  
Photographs of the site showing existing building  
Copy of the Certificate of Lawfulness 2016

<sup>1</sup> Housing Needs Survey Report for Meriden Parish Council August 2018 Analysis by Sarah Brooke-Taylor Rural Housing Enabler, WRCC