

15 March 2019
L 190311 RB Berryfields Farm Representations



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Dear Sir/Madam,

Solihull Local Plan Review: Draft Local Plan Supplementary Consultation

Savills is appointed by J H Barber and Son in respect of their land interests Land South East of Meriden, hereafter 'the site'. This submission is made in response to Solihull Metropolitan Borough Council's (SMBC) Draft Local Plan Supplementary Consultation Document (January 2019) and promotes the site for residential housing.

The following plans accompany this representation:

- Red Line Plan (SK01B)
- Constraints Plan (SK02A)
- Illustrative Framework (SK03)

The Site and Surrounding Area

The site is located on the south eastern side of Meriden, south of Main Road and east of Berkswell Road, as shown on the attached red line plan. The site is in single ownership and has the ability to obtain access from Main Road. As shown on the red line plan, land to the south is also in the same ownership.

The site is 7.8 hectares and has the potential to provide residential development, with capacity for circa. 200 dwellings based on a residential development area of 5 hectares and a density of 40 dwellings per hectare. The accompanying illustrative framework provides further detail on the capacity of the site.

The site is greenfield and lies within the Birmingham Green Belt. There are two listed buildings near to the site – The Elms fronts Main Road immediately north of the site and the Meriden War Memorial is located at the junction of Main Road and Berkswell Road, 80m north west of the site. There are two Conservation Areas in Meriden – Meriden Green is approximately 650m north west of the site and Meriden Hill is approximately 200m south east of the site. Two Public Right of Way cross the site; one from Main Road and one from Berkswell Road south of the Social Club. These constraints are shown on the attached constraints plan.

The site falls within a Mineral Safeguarding Area for Coal. This means that proposals for non-mineral development will only be permitted where it can be demonstrated that the development will not result in the sterilisation of mineral resources, the loss of important infrastructure or sites for potential infrastructure needs in the area. Due to the location of the site in close proximity to existing residential development the extraction of the site is unlikely to be feasible.

The A45 (Birmingham to Coventry Road) passes just north of Meriden Village. The entrance to the National Exhibition Centre (NEC), Birmingham International Airport and Birmingham International Rail Station is located approximately 2.5km to the north west of the village at Junction 6 of the M42. There is a frequent daytime bus service to Coventry and Birmingham. There are bus stops located approximately 200m east of the site and

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250m west of the site along Main Road. The site, as well as Meriden Village itself, is therefore a sustainable and accessible location for development.

Meriden Village offers a range of services, including:

- Primary school (0.6 mile north west of the site)
- GP Surgery (0.1 mile east of the site)
- Supermarket (0.5 mile west of the site)
- Post office (0.4 mile west of the site)
- Village hall (0.1 mile east of the site)
- Sports Park (0.6 mile west of the site)
- Two pubs (0.3 mile east and 0.3 mile west of the site)
- Hotel and restaurant (opposite the site)
- Restaurant and Farm Shop at Berryfields Farm (0.3 miles south of the site)

Duty to Cooperate

The Duty to Cooperate was established in the Localism Act 2011, which amended the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils and public bodies to engage constructively, proactively and on an ongoing basis to ensure that significant issues that affect more than one local authority area are addressed adequately within plans. This Plan must therefore consider influences on and the requirements of adjoining areas and how strategic infrastructure is to be delivered.

Paragraph 26 of the National Planning Policy Framework (NPPF) states that joint working between authorities should help to determine whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. Solihull is one of 14 local planning authorities that is within the Housing Market Area (HMA) that includes Birmingham and surrounding authorities.

The Strategic Growth Study (February 2018), undertaken by GL Hearn to help inform the Duty-to-Cooperate discussions, indicates that based on current supply assumptions, and taking into account proposed allocations in emerging plans, there is an outstanding minimum shortfall of 28,150 dwellings to 2031 and 60,900 dwellings to 2036 across the Birmingham HMA.

The supplementary consultation document states a contribution towards the HMA shortfall of 2,000 dwellings. It has previously been raised through representations on the Draft Local Plan that there is no clear justification why 2,000 is the chosen figure Solihull would make towards the HMA shortfall and that there is opportunity to make a greater contribution. We consider that these comments remain, and there is still an opportunity to make a greater contribution to the HMA shortfall.

To help provide a greater contribution to the HMA housing shortfall, SMBC should be identifying further site allocations.

Green Belt Assessment

The NPPF sets out that Green Belt boundaries should only be altered if it can be demonstrated that there are 'exceptional circumstances' for doing so. The Council believes that exceptional circumstances exist for some land to be released from the Green Belt to accommodate the Borough's own needs and a contribution to the unmet needs arising from the wider HMA. This is on the basis that there are significant unmet needs that cannot be accommodated without using land in the Green Belt.

Paragraph 134 of the NPPF sets out the five purposes of the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*

- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Solihull Strategic Green Belt Assessment was prepared in July 2016. The purpose of this assessment was to assess the extent to which the land currently designated as Green Belt within SMBC fulfils the essential characteristics and purposes of Green Belt land as set out in the NPPF. The assessment utilises two distinct categories of assessment area: Refined Parcels and Broad Areas. Refined Parcels of Green Belt land adjoining or adjacent to built-up areas, including inset villages were defined. The wider rural areas were divided into Broad Areas which were defined as Green Belt land that is not located on the edge of, or adjacent to, large built up areas within SMBC or those within adjoining authorities.

The site forms part of a Refined Parcel identified in the assessment: Parcel RP26: Land South of Main Road Meriden.

The table below has taken the comments on the site within the Strategic Green Belt Assessment Report (July 2016) for each purpose of the Green Belt purposes (comments in italics are taken directly from the report). The Refined Parcel was assigned a score of 0, 1, 2 or 3 for each of the first four purposes of the Green Belt:

- 0 – refined parcel does not perform against the purpose;
- 1 – refined parcel is lower performing against the purpose;
- 2 – refined parcel is more moderately performing against the purpose;
- 3 – refined parcel is higher performing against the purpose.

	Purpose of the Green Belt	Rating	Commentary	Score
a)	to check the unrestricted sprawl of large built-up areas	<i>1 - Ribbon/other development is already present and/or other development is detached from the existing built-up area with no clear Boundary.</i>	<i>Parts of Refined Parcel RP26 already has development present at Meriden Hall and along Berkswell Road. The area to the east of Berkswell Road is undeveloped agricultural land with residential gardens and established field patterns forming the boundaries.</i>	1
b)	to prevent neighbouring towns merging into one another	<i>1 - Refined Parcel represents a gap of more than 5 kilometres between urban areas.</i>	<i>Refined Parcel RP26 forms part of the Meriden Gap separating Coventry to the east from Birmingham and Solihull to the west.</i>	1
c)	to assist in safeguarding the countryside from encroachment	<i>1 - Refined Parcel is adjoined by countryside and has development present.</i>	<i>Refined Parcel RP26 is characterised by countryside but it's adjoined by developed land and has development present.</i> The site itself does not have development present but is still adjoined by developed land to the north and west. The site provides a clear boundary to separate the site from the surrounding open countryside to the south and east.	1
d)	to preserve the setting and special character of historic towns	<i>0 - Refined Parcel is not within or adjacent to a Conservation Area within a historic town</i>	<i>Refined Parcel RP26 is not within or adjacent to a Conservation Area or historic town.</i>	0
e)	to assist in urban regeneration, by	-	It is recognised that within the Borough it is necessary to allocate	-

encouraging the recycling of derelict and other urban land		sites within the Green Belt to accommodate the Borough's own needs and the unmet needs from the wider HMA.	
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The overall combined score of the parcel is 3 out of a maximum score of 12 for the highest performing areas against the purposes of the Green Belt. The map at Appendix F of the Strategic Green Belt Assessment (July 2016) shows that out of the refined parcels assessed, Parcel RP26 is one of the lowest performing parcels in the Borough. Out of 89 parcels assessed, 6 parcels scored 0 and 9 parcels scored between 1 and 3. The rest of the parcels scored 4 or higher.

Around Meriden, there is a parcel to the west that scores 0 (Parcel RP24: Land at junction of B4104 Birmingham Road and B4102 Hampton Lane, Meriden) and a parcel to the east of Meriden that scores 5 (Parcel RP25: Land to the north and east of Meriden). A broad area then surrounds the rest of Meriden scoring 12.

Considering the above, and the need to identify Green Belt sites to accommodate SMBC's housing need and the unmet need of the HMA, the site should be assessed further as a potential residential housing allocation. The site has been assessed as part of the wider Parcel RP26 in the Green Belt Assessment, however, the site has not been assessed individually as a site in the Draft Local Plan Supplementary Consultation Site Assessments.

Site Selection Process

The Draft Local Plan Supplementary Consultation Document sets out a Site Hierarchy criteria as part of the site selection process. Based on the site selection process, the site adjacent to Meriden is considered to be accessible as it is on the edge of a settlement that has a range of services including a primary school and retail facilities. The site is in a Green Belt location, however, as set out above the site is a lower performing Green Belt location. Based on this, the site would score priority 5 which identifies it as a potential inclusion site.

The analysis in step 2 confirms whether potential allocations should be included as green or amber sites in the consultation. Green sites are to be included in the plan as an intended allocation which means the development of the site has either no or only relatively low impacts on relevant considerations. Amber sites are not to be included in the plan, but for the purposes of the consultation the sites are highlighted so that residents and others can comment on whether these sites are 'less harmful' than those placed in the red category. Red sites are not to be included in the plan as development would have severe or widespread impacts that are not outweighed by the benefits of the proposal.

The step 2 refinement criteria sets out factors identifying the considerations that will be taken into account as the results from step 1 are refined. The table at paragraph 75 of the consultation document has been used to assess the site further.

Factors in favour	Factors against
<ul style="list-style-type: none"> - Meriden is identified for limited growth, however, given its location in close proximity to Junction 6 of the M42 and the facilities it has to offer, we consider that more housing allocations should be identified at Meriden. - The site has few constraints to development; it is in flood zone 1, has limited ecological value, is a reasonable distance from the two conservation areas and any impact on the two nearby listed buildings would be very limited. - The site has a clear green belt boundary. Surrounding land is in the same ownership, 	<ul style="list-style-type: none"> - The site is in the 'Meriden Gap' – a key gap between Solihull and Coventry, however it is considered that development of the site relates well to Meriden and would not impact on the gap between Solihull and Coventry. - The site is in a Landscape Character Area (LCA): LCA 4 – Rural Centre. This LCA is split into sub-areas. The site falls into sub-area 4D which is considered to have a high Landscape Character Sensitivity and medium Visual Sensitivity. The Landscape Value of the sub-area is considered to be Medium.

<p>therefore, green belt boundaries can be enhanced further.</p> <ul style="list-style-type: none"> - The site has been shown to score low against the purposes of including land within the Green Belt. - The site is accessible from Main Road. - The site is less than a 10 minute walk from a range of services, including a supermarket and bus stops with regular services to Coventry and Birmingham. - The site is available for development. 	
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The table above, shows the site has a number of factors in favour of the site coming forward for residential development. The biggest constraint is the location within the Green Belt, however, it has been shown above that the site scores low when assessing the area against the purposes of the Green Belt.

Chapter 11 of the consultation document covers Meriden. Paragraph 281 states that *“the moderate impact on the Green Belt to the west and the accessibility of the village indicate that this settlement is suitable for consideration for limited growth, which could be focussed in an area to the west close to services and public transport”*. We consider that even though the site is in the east of the village, it still offers a sustainable location in close proximity to public transport and other services as demonstrated above. In addition, the sustainable location of the village, in close proximity to Junction 6 of the M42 and with regular bus services to Birmingham and Coventry, means more development should be considered for Meriden than is currently proposed. The existing allocation proposed at Meriden is identified as being able to accommodate around 100 dwellings. Given the size of Meriden with a population of around 2,000 people, the services available and relationship with Birmingham and Coventry, the village should be looking at providing further housing.

Summary and Conclusions

Savills has prepared these representations on behalf of J H Barber and Son in respect of their land interests at Land South East of Meriden.

The site has, to date, not been assessed as a potential site allocation as part of the Solihull Local Plan Review. The site adjoins the settlement of Meriden and is in walking distance to a number of services within the village. In addition, the site is well connected to both Birmingham and Coventry. The site is located within the Green Belt, however, the Solihull Strategic Green Belt Assessment (July 2016) shows this area of land as performing poorly in relation to the purposes of including land within the Green Belt as set out in the NPPF.

The Draft Local Plan Supplementary Consultation document proposes one site allocation at Meriden, with the capacity to accommodate around 100 dwellings. Given the connections Meriden has with Birmingham, Coventry and Junction 6 of the M42 and the services it provides, the Local Plan should be looking to allocate an additional site at Meriden.

We would welcome the opportunity for the site to be formally assessed as a potential site allocation in this Local Plan Review. We consider that the site has merits in coming forward for residential development and considering the housing needs of the Borough and the housing shortfall in the wider HMA, SMBC should be looking at allocating further sites for housing.

If you require any further information at this time, please do not hesitate to contact me using the contact details at the top of this letter.



Yours faithfully,



Rebecca Bacon
Planner