

15th March 2019

REF: FRON1036

Planning Policy Team
Solihull Metropolitan Borough Council
Council House
Manor Square
Solihull
B91 3QB

Sent by email: psp@solihull.gov.uk

Dear Sir / Madam

RE: DRAFT LOCAL PLAN REVIEW SUPPLEMENTARY CONSULTATION (JANUARY 2019) – SITE 10 WEST OF MERIDEN

I act on behalf of Frontier Estates Ltd, who have an ongoing interest in (the southern part of) the above site and write in response to the current consultation on the Local Plan Review Supplementary Consultation. I trust that these representations, duly made within the determined timescales will be formally accepted and considered.

By way of background, my client has recently submitted a request for pre-application advice (ref: PL/2019/00495/PREAPC) for the above site – and that should be cross referenced with the content of these representations. A meeting is to be held imminently with the Planning Officer and following that meeting, and advice received thereafter, my client's position in relation to the site will be confirmed. We would be pleased to provide further information and additional submissions to the Council at that point.

In the meantime, the proposed allocation of 'Site 10 – West of Meriden' (with the Concept Masterplan as presented on pages 74 – 78 of the Local Plan Review Supplementary Consultation document) is noted and supported in general terms. It is understood that the proposed allocation of the site will be as a 'gateway development into Meriden' for 100 homes, at a density of 40+ dph (with the highest density on the corner of Maxstoke Lane and Birmingham Road – where it is noted that development of up to 3 storeys might be appropriate). Overall, the principles of this site allocation in terms of the quantum of development and the proposed density approach, are supported.

In considering the site allocation going forward, attention is drawn to the following pertinent points taken from the National Planning Policy Framework (NPPF) – adopted in 2012, and revised July 2018 and February 2019 - and associated Planning Practice Guidance (PPG):

- a sufficient amount and variety of land should come forward where it is needed to “boost significantly” the supply of housing and this should be informed by a local housing need assessment and a housing requirement figure for the whole area (**paragraph 59**)
- planning authorities should plan for a mix of housing based on current and future trends to meet the needs of different groups within the community (such as the elderly) (**paragraph 61**).
- **Paragraph 80** supports economic growth in general terms, and **paragraph 84** goes on to recognise that sites beyond existing settlements may be required to meet local business and community needs.
- **Paragraph 117** outlines that policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, “*while safeguarding and improving the environment and ensuring safe and healthy living conditions*”.
- With regards to the delivery of housing to meet the needs of elderly people, the Planning Practice Guidance establishes: “*The need to provide housing for older people is critical given the*

projected increase in the number of households aged 65 or over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied. In decision-taking, evidence that development proposals for accessible and manageable homes specifically for older people will free up under-occupied local housing for other population groups is likely to demonstrate a market need that supports the approval of such homes.” (NPPG: Paragraph 037 Reference ID: 3-037-20150320).

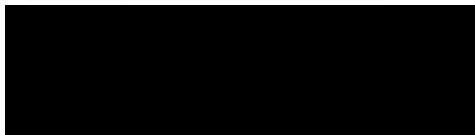
- In addition, the PPG confirms that older peoples housing completions (class C2) will be counted towards the housing supply, by noting that *Local Planning Authorities will need to count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, Authorities should base calculations on the average number of adults living in households, using the published census data...” (paragraph 043, Reference ID: 3-043-20180913, Revision Date: 13/09/2018)*
- The NPPF introduces a Housing Delivery Test which will measure the “...net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data”. This test was introduced from November 2018, and each year thereafter the results for each local authority published.

Accordingly, it is suggested that the proposed site allocation (site 10 ‘West of Meriden’) would be suitable for a range and type of housing across both C2 and C3 Use Classes – which would include accommodation suitable for the elderly. This should be recognised within the emerging site allocation policy to confirm that the (proposed) 100 homes to be brought forward on this site can include provision for both C2 and C3 floorspace. In doing so, the Local Plan Review policy, and the allocation for site 10 specifically, would be ‘sound’ insofar as it would conform with the provisions of national planning policy.

I trust that this submission is useful in confirming my client’s overall support of the removal of ‘site 10 West of Meriden’ from the Green Belt and for its suitability for redevelopment for housing, which should include for all suitable types of class C2 and class C3 uses. As noted above, my client is currently in pre-application discussions with the Council and following our meeting with the Planning Officer (and written advice to be received thereafter) we would be pleased to discuss the emerging Local Plan Review further.

We look forward to engaging further in the process and would be grateful if you could keep us updated with regards to the emerging Local Plan Review, and its timetable for preparation. We anticipate making further full representations to the formal Regulation 19 stage of the Local Plan Review. In the meantime, please do not hesitate to contact me to discuss further.

Yours Sincerely



Hannah Pearce
Associate Director

