



**Consultation response on behalf of Stonewater to
the Solihull Draft Local Plan Review 2016
Consultation**

Feb 2017

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This is the response of the Stonewater Group to the consultation by Solihull Council on the Solihull Draft Local Plan 2016. The purpose of the response is to comment on the draft Plan and promote the site at the Firs Maxstoke Lane Meriden currently included as part of a housing allocation 10 West of Meriden within the Plan. The response is by chapter order with the site being promoted under the section on “Any Other Comments”.

Challenges

Q1. Do you agree that we’ve identified the right challenges facing the Borough? If not why not? Are there any additional challenges that should be addressed?

- Yes, agree with the challenges identified particularly the requirement in line with the NPPF, to meeting the Borough’s full objectively assessed housing need and also accommodating some of the HMA wide housing shortfall.

Vision

Q2. Do you agree with Borough Vision we have set out? If not why not and what alternative would you suggest?

- Agree in principle and in particular:
 - the rural area vision of sustaining the network of strong and vibrant communities across the rural area and also the increased range of affordable housing provided in each community commensurate with the size of the settlement and its needs.
 - The specific rural vision for Catherine de Barnes, Hampton and Meriden which states “A mix of market and affordable housing will have been provided in Hampton in Arden and Meriden to contribute towards meeting the Borough’s housing needs...”

Spatial Strategy

Q3. Do you agree with the Spatial Strategy we have set out? If not why not and what alternative would you suggest?

- Agree in principle and supporting:
 - The strategic objectives and sequential approach to directing growth.

- At paragraph 100 reference to the advantages of the balanced approach between concentration and dispersal with the provision of some smaller sites assisting the early delivery of housing during the Plan period and supporting existing services.
- At paragraph 108 the selection of land west of Meriden as an appropriate growth opportunity under Growth option F, a location where growth should be focussed and land released from the Green Belt.

Sustainable Economic Growth (Policies)

Q4. Do you agree with Policy P1? If not why not and what alternative would you suggest? Q5. Do you agree with the key objectives that development is expected to meet as identified in P1 are appropriate? If not why not? Are there any others you think should be included? Q6. Do you agree with Policy P1A? If not why not and what alternative would you suggest?

- Policy P1 UK Central Hub Area – there is a lack of confidence that the level of residential development anticipated will come forward and within the Plan period. There cannot be any certainty in the timeframe for development of HS2 and the UK Central Hub Area in general and the precise uses and percentages of different land use within the UK Central Hub Area. There is also the concern over the effect this may have on the Airports future plans, its land requirements and ability to expand. Until such issues are resolved the level and timing of housing development cannot be predicted or guaranteed.
- Policy P1A Blythe Valley Business Park – No Comment

Q7. Do you agree with Policy P2? If not why not and what alternative would you suggest? Q8. Do you believe the right scale and location of development has been identified? If not why not?

- Policy P2 Maintain Strong Competitive Town centres – Yes, agree in principle with the policy of maintaining strong and competitive town centres particularly in respect of Solihull Town Centre and the ambition to ensure its continued economic growth and success. However, there has been a

longstanding ambition to both improve the attraction of the centre by increasing its residential capacity and by the relocation of the train station closer to the town centre. Whilst these ambitions are supported they have not moved forward towards realisation and remain ambitions. Whilst a level of housing development will probably take place it is doubtful that the level of housing proposed (1400 within the Town Centre of which 861 within the plan period) is achievable or will be achieved.

Q9. Do you agree with Policy P3? If not why not and what alternative would you suggest? Q10. Do you believe the right scale and location of development has been identified? If not why not?

- Policy P3 Provision of Land for General Business and Premises – Agree with the policy in principle and note that alternative uses may be allowed where specific criteria are met. However concern is expressed that whilst there is an acknowledged acute shortage of housing and a shortage of proposals within the urban area to overcome this, employment sites within the urban area have been identified for housing within the Draft plan, which may conflict with Policy P3.
- General comment – the Plan should ensure that there is an appropriate balance between employment and housing and that employment sites are not sacrificed inappropriately as a consequence of an acute housing shortage.

Providing Homes for All (Policies)

Q11. Do you agree with Policy P4. If not why not and what alternative would you suggest? Q12. Do you agree with the level of affordable housing being sought in Policy P4? If not why not and what alternative would you suggest? Q13. Which option for delivering self and custom housebuilding do you favour and why? If neither do you have any other suggestions?

- Policy P4 Meeting Housing Need – Agree in principle with the policy

Q14. Do you agree we are planning to build the right number of new homes? If not why not and what alternative? Q15. Do you believe we are planning to build homes in the right locations? If not why not and what locations shouldn't be included? Are

there any other locations should be included? Q16 Do you believe we have identified the infrastructure required to support these developments? If not why not ? Are there any additional facilities you believe are required, if so what are they?

- Policy P5 Provision of Land for Housing
 - West Midlands LAs will be carrying out further work on housing numbers and locations within the broad Housing Market Area which may influence subsequent responses to this policy but comments now will directly relate to the current Draft Local Plan.
 - Submissions to the Draft Local plan have raised concerns that the full OAHN presented in the SHMAA provides an underestimate of housing need in the Borough in accordance with current guidance. The SDLP is therefore not planning for the correct number of homes to meet housing need and the housing target should be increased
 - Support for the site and location - Housing allocation 10 (Land west of Meriden) - a site which addresses local housing need and is available and achievable.
 - Concerns are raised about some of the sites/locations allocated in the Draft Plan and site capacities as follows:
 - Solihull Town Centre – the overall housing capacity and capacity within the Plan period are considered to be unachievable. See response to Q8.
 - Moat Lane/Vulcan Lane – ability to bring forward current employment sites at this location within the Plan period and the potential conflict with the employment policy P3 on retention of employment land. Relocation of employment uses may be an option but to where within Solihull? No indication is given within the Plan of such an option
 - South of Dog Kennel Lane – the land to the south of Dog Kennel Lane is extremely open countryside with no clear definitive robust Green Belt boundaries being identifiable, as required by NPPF. With no clear and firm definitive green belt

boundary evident on the allocation plan between Dog Kennel Lane and Cheswick Green it is difficult to assess the level of housing achievable on this site, a site which could lead to coalescence with Cheswick Green.

- The Green Shirley – Identified as an employment site allocation in the Solihull Local Plan 2013 and again in the Draft Plan 2016 but caveated in respect of a potential mixed use site in the next iteration of the Plan following the preparation of a masterplan. Considerable doubt therefore exists over the housing numbers identified for this site as well as the potential conflict with employment policy P3.
- Hampton Road Knowle – the same issue arises on this site as at Dog Kennel Lane with no definitive firm and logical green belt boundary being identified to the north of the site, west of Hampton Road therefore no conclusions can be drawn on housing numbers. Also, there is the issue of loss of a sports pitch with no relocation identified on the land to the east of Hampton Road and consequently therefore an overall target housing figure is difficult to assess.
- land off Meriden Road Hampton in Arden (Former Ammunition Depot) – the land to the west of this site was allocated for housing in the 2013 Local Plan on condition that the former ammunition depot was reclaimed for open space or if not available an alternative development solution delivering additional open space was forthcoming. This situation still exist and so calls into question the allocation. Also the viability of the site is may be affected dependent on any potential contamination issues as a consequence of the former use of the site.
- West of Dickens Heath – the loss of sports pitches is an issue which would need to be resolved with no reference to

relocation or compensation. Development would result in coalescence of Dickens Heath with Majors Green which would be contrary to National Green Belt policy.

- Sharmans Cross Road Solihull. Although unused this is still a loss of Sports pitches and unsure how this impacts on sports provision within Solihull and there is no reference directly to relocation or compensation.
- Chester Road/Moorend Avenue Fordbridge without any detailed information on the remodelling of the road junction, any firm boundary details, the impact of the flood plain or even if a successful development would be achieved, it is difficult to assess the potential or success of this site.

(See “Any Other Comments” below for the justification for including housing allocation 10 Land west of Meriden as an allocation within the Local Plan).

Q17. Do you agree with policy P6? If not why not and what alternative?

- Policy P6 Provision of Sites for Gypsies and Travellers – no comment.

Improving Accessibility and Encouraging Sustainable Travel (Policies)

Q18. Do you agree with the policies for improving accessibility and encouraging sustainable travel? If not why not and what alternatives would you suggest?

- Policy P7. Accessibility and Ease of Access – Agree in principle
- Policy P8. Managing Travel Demand and Reducing Congestion – Agree in principle
- Policy P8A Rapid Transit – No Comment.

Protecting and Enhancing our Environment (Policies)

Q19. Do you agree with the policies for protecting the environment? If not why not and what alternatives would you suggest?

- Policy P9 Mitigating and Adapting to Climate Change – Agree in principle.

- Policy P10. Natural Environment – Agree in principle.
- Policy P11. Water Management – Agree in principle
- Policy P12. Resource Management – No comment
- Policy P13. Minerals – No comment
- Policy P14. Amenity – Agree in principle.

Promoting Quality of Place (Policies)

Q20. Do you agree with the policies for Quality of Place? If not why not and what alternative would you suggest?

- Policy P15. Securing Design Quality – Agree in principle
- Policy P16. Conservation of Heritage Assets and Local Distinctiveness – Agree in principle.
- Policy P17. Countryside and Green Belt. – Agree in principle

Health and Supporting Local Communities (Policies)

Q21. Do you agree with the policies for Health and Well Being? If not why not and what alternatives would you suggest?

- Policy P18. Health and Well Being – Agree in principle
- Policy P19. Range and Quality of Local Services – Agree in principle.
- Policy P20. Provision for Open Space, Children’s Play, Sport, Recreation and Leisure. – Agree in principle.

Delivery and Monitoring (Policies)

Q22. Do you Agree with Policy P21? If not Why not and what alternative would you suggest?

- Policy P21 Developer Contributions and Infrastructure Provision – Agree in principle.

Any Other Comments

In responding to Q15 “do you believe we are planning to build homes in the right location.....” additional comments are provided below to support the inclusion within the Draft Local Plan of the Firs Maxstoke Lane, part of allocated housing site 10 (west of Meriden) :

- **The Firs Maxstoke Lane part of Housing Allocation 10 Land West of Meriden**

It should be pointed out that the Draft Local Plan at paragraphs 224 -229 makes reference to the new allocated housing site boundaries not being fixed and that further work would be undertaken on the options to be taken forward and included in the submitted version of the Plan and that final capacities are likely to vary from the indicative numbers which may mean some sites accommodating more and some less numbers.

Also, the Draft Plan states that the inclusion of a particular parcel of land within the allocated area does not necessarily mean that it is to be developed. In some instances the plans represent the area to be removed from the green belt to create a logical defensible boundary. As has already been indicated in answer to Q15 it would appear that no clear, logical and defensible boundary is shown or can be achieved on some sites.

As a consequence of the uncertainty over sites, site boundaries and site targets, and further, the concerns that the LPA has identified an insufficient housing target, it is doubtful that the allocations are sufficient to meet the housing requirement identified in the draft Local Plan or the increased requirement identified in submissions to the consultation.

1. The Firs Maxstoke Lane Meriden

The Firs at Maxstoke Lane Meriden is identified in the SHELAA as site 137 which together with Site 119 comprises housing site 10 in the Draft Local Plan.

The site lies to the immediate north of Meriden village centre but outside the settlement boundary and Inset area within the Solihull Green Belt. The site is well contained and is bounded on all sides by strong field boundaries containing mature trees and hedgerow and roads on the eastern and north western boundaries and built development to the south. The site is a mixture of Brownfield and Greenfield comprising poor quality grassland and scrub and to the south of the site and sheltered accommodation. The adjoining site 119 similarly comprises poor quality grass and scrub and a caravan storage area and is also bounded by trees and hedgerow and roads to the west and north of the site and built development to the south.

In promoting the inclusion of the site within the Plan, the route adopted by the LPA has also been supported. That is, the strategy of managed growth, the development of strategic objectives and the sequential approach and guiding principles, which has helped determine the locations where growth should be located. Also supported is the growth options identified, particularly Growth Option F – limited expansion of rural villages/settlements and the balanced approach between concentration and dispersal, referred to in paragraph 100. This site which would fall within the dispersed development category would assist in the early delivery of housing during the Plan period and support existing services in the village.

The allocation of the site ensures that Meriden would remain a strong and vibrant community, one of the many diverse settlements in Solihull, which contributes to the Borough's character and strengths. As well as supporting

existing services within the village new housing development will provide an appropriate mix of market and affordable housing. For the local and wider community.

The combination of the two sites allocated for housing provide firm and defensible green belt boundaries in the form of mature tree and hedgerow boundaries supplemented by the main roads, Maxstoke Lane to the east and north-west and Birmingham Road to the south-west.

In landscape terms the site would be perceived as urban fringe and low in quality. The site is isolated from the wider countryside by “old” Maxstoke Lane on the east of the site and the more recently constructed Maxstoke Lane to the north-west, the new link road from Birmingham Road to the A45 in the north. This recently constructed road rises to the bridge over the A45 to gain access to both sides of the A road. This essentially separates the site visually from the rest of the countryside to the north and west. The A45 itself is a barrier to the more open countryside to the north of Meriden.

Being one of the submissions at the “Call for Sites” stage the site was assessed against the various studies and to support its inclusion the following points should be noted:

- In respect of the Green Belt Assessment (Appendix F) looking at the refined parcels and broad areas scores the site, which is within refined parcel RP25 land to the north and East of Meriden, performs moderately against the purposes of the Green Belt and has a combined score of 5 which is better than or equal to many of the other allocated housing sites. The adjoining site, which makes up the allocation, is within refined parcel 24 and has a combined total of 0, in other words not performing well against the purposes of the Green Belt.

- In assessing the site against the Accessibility Mapping (Figure 6A - Site Accessibility & Appendix E - Accessibility Summary Spread Sheet) the site is highly accessible, one of the most accessible locations within the Green Belt and with a high accessible total score of 360 where the site/location highest score achieved on any site was 400. The site is highly accessible to local facilities, including to the primary school, food stores and public transport by bus.
- In assessing the site through the Strategic Housing and Employment Availability Assessment (SHELAA) the Appendix 5 Housing Site assessment record shows that the site is greenfield and in one ownership. It is marketable, readily available and achievable within the parameters of the Plan period. Within the suitability criteria the site shows no constraints. In summary the site performs well against the suitability, availability and achievability criteria and is identified within category 1

In conclusion, a response has been provided to all questions within the Draft Local Plan consultation. As a consequence of the uncertainty over sites, site boundaries and site targets, and further, the concerns that the LPA has identified an insufficient housing target, it is doubtful that the allocations are sufficient to meet the housing requirement identified in the draft Local Plan or the increased requirement identified in submissions to the consultation. However, these concerns apart, this site is available, achievable and suitable. It has firm and defensible Green Belt boundaries and conforms to the Local Plan Vision and Strategy and should be retained as an allocation within the Local Plan.