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To whom it may concern

### **Draft Submission Local Plan Review – Consultation October 2020**

#### **Representations on behalf of Frontier Estates Ltd**

We act on behalf of Frontier Estates Ltd, and write in response to the current consultation on the Submission Draft of the Local Plan Review.

We trust that these representations, duly made within the determined timescales, will be formally accepted and considered.

#### **Background**

By way of background, our client has an ongoing interest in (the south-western part of) the site known as 'West of Meriden', which is proposed for allocation through the emerging Solihull Local Plan Review - policy ME1 'West of Meriden (between Birmingham Road and Maxstoke Road)'.

On their behalf, we have previously submitted representations to the draft Solihull Local Plan Review Supplementary Consultation of January 2019 and also to the Pre-Submission (reg 14) and Submission (reg 16) drafts of the Meriden Neighbourhood Plan (to the Meriden Parish Council in October 2019 and August 2020).

We have also submitted a request for pre-application advice (ref: PL/2019/00495/PREAPC) to your Authority for the West of Meriden site – and that should be cross referenced with the content of these representations. A meeting was held in March 2019 with the LPA, which confirmed that allocation ref ME1 ("site 10" as was) is allocated for housing and that C2 housing would fall within the definition of housing for the purposes for the proposed allocation.

#### **Representations**

Against that above background, and having reviewed the Submission Draft of the Local Plan Review, we set out below representations to be considered to policies and paragraphs as relevant.

#### **Policy ME1 – West of Meriden (between Birmingham Road and Maxstoke Road)**

The proposed allocation of site ref 'ME1 - West of Meriden' is noted and supported in general terms. It is understood that the proposed allocation of the site will be for around 100 dwellings, 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.

Notwithstanding, and in considering the details of the proposed 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 most recently in June 2019 - and associated Planning Practice Guidance (PPG):

- a sufficient amount and variety of land should come forward where it is needed to significantly boost the supply of homes - and the needs of groups with specific housing requirements should be addressed (**paragraph 59**)
- planning authorities should assess and plan for a mix of housing to meet the needs of different groups within the community (including older people) (**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 in rural areas.
- **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 (published in June 2019) establishes that *“The need to provide housing for older people is critical...Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”* (paragraph 001 Reference ID: 63-001-20190626)
- The PPG goes on to note that: *“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period”* (Paragraph: 006 Reference ID: 63-006-20190626)
- Further, *“Plans need to provide for specialist housing for older people where a need exists...(and) plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people...”* (paragraph: 012 Reference ID: 63-012-20190626)
- In addition, the PPG confirms that older peoples housing completions (class C2) will be counted against an Authority’s housing requirement – and that, *“...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: 016a Reference ID: 63-016a-20190626)

Accordingly, it is suggested that the proposed site allocation ME1; West of Meriden, would be suitable for a range and type of housing, including both C2 and/or C3 Use Classes – which would include accommodation suitable for older people.

Whilst the provisions of other policies are noted (and particularly P4E, as referenced below), it is considered that it should be recognised within the site allocation policy to confirm that the (proposed) 100 homes to be brought forward on this site can include provision for both Use Class C2 and/or C3 housing. In doing so, this would conform with the aspirations of the Concept Masterplan produced to date, as well as policy P4E of the emerging Local Plan Review (as noted further below) which confirms that new housing developments will be expected to provide a mix of dwellings to meet the identified needs of older people, and specifically supports applications for specialist housing for older people where the site is in close proximity to amenities, public transport and can make a positive contribution towards meeting identified need. The site in Meriden can suitably address these criteria.

**Notwithstanding our support for the policy allocation ME1, in order that the policy is considered ‘sound’ (so that it conforms with the provisions of national planning policy), it is suggested that the policy wording**

**be amended to confirm that a housing mix / type could be brought forward on the site, and which could include provision for older person housing, in line with policy P4E.**

Further, and in relation to the specific criteria of the policy, there appears to be no reasoned justification for their inclusion (albeit that they apparently build on the Concept Masterplan for the site). That justification, and the evidence basis for the policy criteria, must be provided so that the policy can be considered 'sound'.

**In particular, we suggest that the following points require greater clarity – so that they can be effectively delivered and, therefore, be considered 'sound':**

- *“No development within any area of higher flood risk zones”* – The reference to 'higher flood risk zones' needs to be defined in full (and whether this relates to Zone 2 / 3a / 3b). In any case, the policy should not be more prescriptive than national policy and guidance, and where development in those flood zones (as nationally defined by the Environment Agency) is accepted, subject to relevant criteria and assessed justification;
- *5% of open market dwellings to be provided in the form of Self and Custom Build Plots in accordance with Policy 4D* – This is considered too prescriptive and should be removed from the policy wording altogether, where it could compromise viability and therefore deliverability of any proposals on the site;
- *Retention of trees and hedgerows across the site to ensure the mature character of the site is safeguarded* - It should be clarified that there can be exceptions to retention, where that is justified and will be counter-balanced where appropriate and necessary with replacement planting. Again, as worded, the criterion is too prescriptive and may compromise the deliverability of any proposals;
- *Provision of a minimum of 0.66 ha of Public Open Space to be provided around the pond and the group of significant trees within the centre of the site* – This amount of open space could significantly reduce the area of the site which could be developed and, accordingly, would be likely to render any proposals unviable. Whilst it is acknowledged that some public open space would be of benefit to the wider site proposals, and therefore could be provided, the exact amount should not be as prescriptive, to ensure deliverability. Instead, the pond itself can benefit from a level of protection in the policy wording whilst the amount of open space to be provided should be commensurate with the number and type of dwellings proposed for the site.
- It should be clarified within the policy wording that the requirement for any financial contribution to education provision would be applied to Class C3 housing only (for the general market), and not any housing for older people, which would usually fall within Use Class C2 and where an education contribution would not be justified.

### **Concept Masterplans October 2020 – ME1: West of Meriden - pages 99 to 103**

It is understood and noted that the masterplans set out in this document, which accompanies the Local Plan consultation, are illustrative only, and are subject to change - where further infrastructure survey work will be carried out at the application stage, and the proposals further refined. This approach is supported, where it is recognised that any proposals for the site will come forward in line with the relevant local and national planning policy at that time.

On that basis, it is not considered appropriate or necessary to provide in full detail the 'Applicant Site Proposal' on page 102, where that provides just one iteration of a scheme that, as far as we are aware, is no longer being pursued (despite there being mention of the Concept Plans having been developed in collaboration with the site owners / promoters). The site proposals will evolve, in line with further survey work and in discussion with the LPA.

Hence, the inclusion of a site layout plan (presented as a pre-application request) is not appropriate within a Concept Masterplan – and where the ‘Illustrative Concept Masterplan’ on page 103 is sufficient for the purposes of providing general guiding principles for development on the site.

Further, there is a noted discrepancy between the site layout plan and the illustrative concept masterplan, where the proposed access off Birmingham Road is shown in different locations. It should therefore be noted within the Concept Masterplan that the exact position of the access road will be determined in accordance with evidenced justification (and agreed with the highways team) at the time any planning application is made.

#### **Policy P4E – Meeting Housing Needs – Housing for Older and Disabled People**

This policy is supported in general terms, where it is considered sound insofar as it is justified and in accordance with national planning policy. Further, it is based on robust evidence – and where it is noted that the HEDNA (October 2020) identifies a significant need for housing for older people – including 469 ‘extra-care’ units and 1,035 care bed-spaces (residential and nursing) up to 2036. In particular, and in the more immediate term there is an identified need for 1,048 bed-spaces up to 2026.

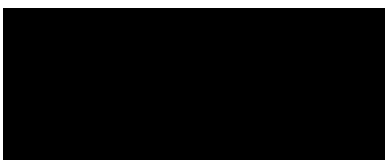
**We support the policy where it notes that:**

- *New housing developments will be expected to provide a mix of dwelling size and type to meet the identified needs of older people and those with disabilities and special needs in accordance with current assessments of housing need and evidence;*
- *Applications for specialist housing for older people...will be supported (subject to a number of criteria), and*
- *Applications for care homes (Use Class C2) for older people...will be supported (subject to a number of criteria)*

We trust that this submission is useful in confirming my client’s overall support of the removal of site ME1 (West of Meriden) from the Green Belt and for its suitability for redevelopment for housing, which could include for all types of class C2 and class C3 uses. Pre-application discussions with the Council acknowledged that the proposal for C2 care home and extra-care apartments would fall within the definition of housing for the purposes of this proposed allocation.

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 submission and examination. In the meantime, please do not hesitate to contact me to discuss further.

Yours Sincerely



Hannah Pearce

**Associate Director**

