



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

Name of the Local Plan to which this representation relates:

Solihull MBC Local Plan

Please return to psp@solihull.gov.uk or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14th December 00:00

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mrs"/>
First Name	<input type="text" value="J"/>	<input type="text" value="Glenda"/>
Last Name	<input type="text" value="Kimberley"/>	<input type="text" value="Parkes"/>
Job Title (where relevant)	<input type="text" value="c/o Agent"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="Tyler Parkes"/>
Address Line 1	<input type="text"/>	<input type="text" value="66 Stratford Road"/>
Line 2	<input type="text"/>	<input type="text" value="Shirley"/>
Line 3	<input type="text"/>	<input type="text" value="Solihull"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="B90 3LP"/>
Telephone Number	<input type="text"/>	<input type="text" value=""/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value=""/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	753-758 & 226	Policy	ME1	Policies Map	Meriden Settlement Boundary
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	X	No	
4.(2) Sound	Yes	X	No	
4 (3) Complies with the Duty to co-operate	Yes	X	No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ME1 West of Meriden (Between Birmingham Road and Maxstoke Road)

Justification Paragraphs 753 to 758

'Summary Table of Residential Allocations' Paragraph 226; and

Proposed Policies Map with revised Meriden Settlement boundary.

Summary

- Our Client, Mr. Kimberley, owns part of Proposed Residential Allocation under Policy ME1 West of Meriden (Between Birmingham Road and Maxstoke Road) for at least 100 dwellings to be delivered within Phase I of the Plan period.**
- Our Client fully supports the principle of the continued allocation of Site ME1 West of Meriden (Between Birmingham Road and Maxstoke Road), a part brownfield, edge of settlement, sustainable site, for residential development. The proposed amendment of the settlement boundary to accommodate housing on site ME1, as shown on the Proposed Policies Map, is sound and meets the requirements of national planning policy, guidance and the strategic objectives set out in the Draft Submission Solihull Local Plan (SLP). Including being in accordance with National Planning Policy Framework (NPPF) paragraphs 136 and 137.**

3. Our Client supports the decision to release Green Belt to accommodate the identified growth, including the Green Belt around Meriden, identified as a settlement that can accommodate housing growth.
4. Our Client can confirm that residential development on that area of Site ME1 over which he has control, is deliverable and developable within the first 5 years of the plan period, as set out in the Allocated sites Summary Table at paragraph 226 – in accordance with NPPF Annex 2 Glossary definition and PPG Paragraph: 007 Reference ID: 68-007-20190722 and Paragraph: 019 Reference ID: 68-019-20190722.
5. Our Client supports the proposed distribution of development set out in the SLP that seeks to distribute housing both within the urban area of the borough, and disperse across a number of identified settlements, including Meriden.
6. Our Client agrees with the SLP, October 2020 (paras. 753-757), that Proposed Residential Allocation ME1 West of Meriden forms a logical western extension to the village; is in a low performing area of Green Belt; is within easy walking distance of Meriden village centre; is well located, in accessibility terms, to public transport and other services; will have significant positive effects for access to services and transport links; and the quantum of open space available within the proposed allocation gives the opportunity for a high quality integrated SuDs scheme that can offer maximised multi-functional benefits.
7. Our Client notes that the Meriden Neighbourhood Plan (Submission Version – March 2020) confirms that the community were invited to take part in a straw poll consultation in September 2016 to choose three sites they thought would be suitable for development and three they thought would not be suitable, with the results showing that SMBC's proposed housing allocation site 10 (our Client's site) was the most highly preferred by residents for housing development (paras. 5.2.2 and 5.2.3 of the Neighbourhood Plan).
8. It is also noted that the Meriden Neighbourhood Plan (Submission Version – March 2020) references Meriden's Housing Needs Survey 2018 which confirms that there is a need for forty-five new homes for people with a defined local connection. In addition, it is noted that Meriden's Housing Needs Assessment (AECOM) 2018/19 showed that 86 Affordable Housing units (includes Social Rented, Affordable Rent and intermediate housing such as Shared Ownership), should be built until 2033. Demand is strongest for 2-bedroom properties. It is contended that the development of Site ME1 West of Meriden will go some way towards meeting that identified need.
9. Our Client confirms that in the unlikely event that parts of Site ME1 West of Meriden were to be developed in parcels, our Client's site forms a logical housing site in isolation, with a willing owner and clearly defensible Green Belt boundaries including a long road frontage. The proposed layout in the SLPR 'Solihull Local Plan Site Allocations – Masterplans' October 2020 page 102 provides evidence of this. If land in our Client's ownership is brought forward for redevelopment within the first phase of the Plan period, as set out in the table at paragraph 226 of the SLP, this would not impact the deliverability and developability of the proposed allocation as a whole.

The remaining land, which is adjacent to Maxstoke Lane, would not be sterilised by development on our Client's land.

10. Our Client supports the Council's comment in Policy ME1 2(i) and (ii) that the development will contribute to the creation of a gateway into Meriden, with the highest density of homes to be built on the corner of Maxstoke Lane and Birmingham Road. The confirmation in the 'Solihull Local Plan Site Allocations – Masterplans' October 2020 page 103 that development up to 3 storeys could be appropriate on this corner, subject to design, is welcomed.
11. Our Client formally requests that 'Solihull Local Plan Site Allocations – Masterplans' October 2020 be corrected to include reference to the fact that part of Site ME1 West of Meriden 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.

Detailed Comments

12. The SLP 2020 continues to Propose Residential Allocation ME1 West of Meriden (Between Birmingham Road and Maxstoke Road). 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. In addition, in March 2019, comments were made in respect of the site to Question 30 of the Draft Solihull Local Plan Review Supplementary Consultation.

The Principle of removing Site ME1 (Between Birmingham Road and Maxstoke Road) from the Green Belt and identifying it for Residential Development is sound.

13. It is sound that Site ME1 West of Meriden (Between Birmingham Road and Maxstoke Road) is proposed for removal from the Green Belt and allocated for residential development for the reasons set out below.
14. The NPPF confirms that removing land from the Green Belt should only occur through the plan-making process when justified by 'exceptional circumstances', as detailed in NPPF paragraphs 136 and 137. The significant need for housing and the shortage of an adequate housing land supply outside the Green Belt has satisfied this 'exceptional circumstances' test as demonstrated in the SLP and evidence base. It is therefore sound that land is identified for removal from the Green Belt and for allocation for residential development.
15. When identifying land for removal from the Green Belt, the NPPF states at paragraphs 138 and 139, that:

'138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account... Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

139. When defining Green Belt boundaries, plans should:
 - a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
 - b) not include land which it is unnecessary to keep permanently open...*

- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

16. Site ME1 is part previously developed land in a sustainable location. The proposed allocation 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 1). In addition, there is also a building on this site. The site is clearly partly previously developed land and should be referenced as such in the SLP.
17. Development of this part of the site meets planning policy requirements of the SLP and the NPPF 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. 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. The brownfield status of part of the site is therefore material to the continued allocation of the site for housing, in accordance with the national planning policy, having a Certificate of Lawfulness for the caravan storage.
18. Notwithstanding the partial brownfield nature of part of the Proposed Residential Allocation Policy ME1, the site makes a very limited contribution towards the purposes of including land within the Green Belt (the site is a lower performing parcel overall, with part of the site scoring 0 and the other part only scoring 5 – out of a possible 12, which is very low compared to other proposed allocations (ref. RP24 and RP25 in the Green Belt Assessment Report of 2016).
19. 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. 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. The site has strong 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.
20. 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 Residential Allocation ME1 West of Meriden ((Between Birmingham Road and Maxstoke Road) is therefore in accordance with the provision of the NPPF.

Residential development on Site ME1 is deliverable and developable within the first 5 years of the Plan period

21. Our Client's land comprises the western part of the Proposed Residential Allocation ME1 West of Meriden (Between Birmingham Road and Maxstoke Road). 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. There are no known legal or physical constraints which

would prevent Site ME1 coming forward for development within 5 years. It has no site-specific designations to prevent its development.

22. In the unlikely event that our Client's site was to come forward in isolation from the remainder of the Proposed Residential Allocation Policy ME1, our Client's site 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.
23. Furthermore, the 'Applicant's Site Proposal' on page 102 of the 'Solihull Local Plan Site Allocations – Masterplans' October 2020 confirms that the site can be developed in isolation without impacting on the deliverability and developability of the proposed allocation as a whole. The remaining land, which is adjacent to Maxstoke Lane, would not be sterilised by development on our Client's land. However, there is no reason to assume that the whole site will not come forward for development as allocated.
24. The 'Solihull Local Plan Site Allocations – Masterplans' October 2020 demonstrates how Site ME1 could be developed, with the site delivering 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 through Community Infrastructure Levy (CIL) payments and S106 agreements.
25. The development of Proposed Residential Allocation ME1 West of Meriden will go some way towards meeting the identified need for a mixed tenure of housing, including meeting part of the identified 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 (Housing Needs Survey Report for Meriden Parish Council August 2018).
26. In summary therefore, Proposed Residential Allocation Policy ME1 West of Meriden (Between Birmingham Road and Maxstoke Road) is deliverable and developable within the first 5 years of the Plan period.

The Suitability of the Site for Development

27. Proposed Residential Allocation Policy ME1 lies adjacent to the defined settlement boundary of Meriden. The SLP confirms that Meriden is suitable for consideration for limited growth, which reflects the sensitive environmental nature of the area, the character of the villages and the need to manage the capacity and viability of local infrastructure (paragraph 750 of the SLP).
28. The residential development of the site also has the support of the local community. Our Client's site was shown to be highly preferred for housing development by the community. The Meriden Neighbourhood Plan (Submission Version – March 2020) confirms that the community were invited to take part in a straw poll consultation in September 2016 to choose three sites they thought would be suitable for development and three they thought would not be suitable, with the results showing that SMBC's proposed housing allocation (referenced as Site 10 at that

	time, which is our Client's site) was the most highly preferred by residents for housing development (paras. 5.2.2 and 5.2.3 of the Neighbourhood Plan).
29.	The site does not include any heritage assets, football pitches and community facilities; it is not used for agriculture so there will be no loss of land which is of high agricultural value. There are no known constraints to development.
30.	Solihull Metropolitan Borough Council Level 2 Strategic Flood Risk Assessment Flood Risk Assessment confirms that our Client's site is not subject to any risk from flooding, but the development must have regard to potential flood risk areas. However any impacts can be mitigated against in the detailed design, with the 'Solihull Local Plan Site Allocations – Masterplans' October 2020 confirming an integrated drainage, landscape and ecological strategy should be developed for the site.
31.	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.
32.	Relevant planning policies in support of the continued allocation of Site ME1 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 SLP, Meriden village is identified as suitable for limited expansion and the site is well related to the centre of the village. The SLP paragraph 755 confirms that site is within easy walking distance of Meriden village centre and is well located, in accessibility terms, to public transport and other services.
33.	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.
34.	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 tearoom, hairdressers, a gift shop and library. Meriden also has pubs, hotels, 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.
35.	The SLP 2020 and the 'Solihull Local Plan Site Allocations – Masterplans' October 2020 confirm that the site is not contaminated.
36.	In summary, the proposed westwards extension set out in the SLP under Proposed Residential Allocation Policy ME1 West of Meriden (Between Birmingham Road and Maxstoke Road) fulfils 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 Residential Allocation ME1 West of Meriden 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. The proposed allocation is sound and is fully supported by the independent assessments commissioned by the Council.

Enclosures

Enclosure 1: Certificate of Lawfulness for use of part of Site ME1 for caravan storage. PL/2006/01290/CLD - Certificate of lawfulness for existing use of land for caravan storage on Land adjacent to Former Meriden Garage, Birmingham Road, Meriden, Coventry CV7 7RU

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

37. We have previously raised concern over the omission of reference to Site ME1 being partly brownfield in Proposed Residential Allocation Policy ME1 West of Meriden (Between Birmingham Road and Maxstoke Road) and paragraphs 753-758 of the SLP. Our Client contends that the continued omission of this information is misleading and formally requests that the reference to the site being partially brownfield land is included within the forthcoming versions of the SLP and the supporting evidence reports.

(End)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To address the Council's Responses and the Inspector's Matters, Issues and Questions.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Glenda Parkes

Date:

11/12/2020