

LAND OFF MAIN ROAD, MERIDEN: SOLIHULL LOCAL PLAN DRAFT SUBMISSION (REG. 19) CONSULTATION

Representations on behalf of Redrow Homes Ltd



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1 INTRODUCTION

- 1.1 RPS Consulting Services Ltd ('RPS') is instructed by Redrow Homes Limited ('Redrow') to represent their interests in relation to the Solihull Local Plan ('SLP') in respect of Land off Main Road, Meriden ('the Site') and to formally respond to the Draft Submission Plan ('Reg. 19') consultation and published by Solihull Borough Council ('the Council') in October 2020.
- 1.2 Redrow support the Council in progressing the SLP and the intention to specifically identify suitable site allocations necessary to meet the housing requirement up to 2036. However, Redrow does not support a number of policies proposed in the SLP nor the approach to identifying sites at Meriden settlement.
- 1.3 This submission also provides details of the Site and the emerging proposals prepared by Redrow, which demonstrate that suitable development can be brought forward as soon as required, and so is capable of meeting the housing needs of Meriden in a timely and sustainable manner. Redrow also consider that the Site can be suitably integrated into the existing settlement of Meriden.
- 1.4 The structure for the rest of this submission broadly follows the order of the various sections set out in SLP document.
- 1.5 Redrow are committed to working with the Council and other relevant stakeholders to design a high-quality and sympathetic development for the Land off Main Road, Meriden to deliver significant benefits to the village and to contribute towards meeting the future needs of Solihull Borough up to 2036.

2 LAND OFF MAIN ROAD, MERIDEN

- 2.1 The Site comprises approximately 7.5 hectares of land located adjacent to the eastern and southern boundary of Meriden settlement.
- 2.2 The plan below illustrates the potential extent of development that could be delivered at the Site, comprising areas where built development could be located alongside open space and areas to support sustainable drainage solutions on the Site (SuDs).



Figure 2.1 Land off Main Road, Meriden – illustrative framework for the site

- 2.3 Meriden is a sustainable location for development. The village was classed as one of 14 Local Centres in the adopted Solihull Core Strategy (2013) and incorporates a range of services and facilities including access to public transport services.
- 2.4 The Site is located less than 800 metres from the village centre of Meriden. The village itself is located in the eastern part of the District, approximately five miles east of the Solihull conurbation.
- 2.5 The Site consists predominantly of a single field parcel currently in agricultural use, and bounded by residential gardens along the northern boundary, with hedges and trees forming the other boundary extents. Pedestrian and vehicular access can now be achieved directly from Main Road, through the demolition of two properties, forming the primary connection to the existing settlement.

- 2.6 The Site topography can be described as gently sloping in nature and would not constrain the layout of the Site, therefore offering a degree of flexibility in terms of overall design solutions.
- 2.7 The Site is currently identified as part of the adopted Green Belt drawn around Meriden and forms a (albeit very small) part of the Meriden Gap. Nevertheless, the Council has determined that exceptional circumstances exist to justify the release of Green Belt land in order to accommodate the development needs of the Borough over the plan period (up to 2036). Redrow supports the decision to release land from the Green Belt as a suitable and reasonable response to the future demands for land to address the requirements of the SLP, which is reflective of the lack of available previously developed land in the Borough.
- 2.8 As demonstrated in this submission, the Land off Main Road offers an appropriate opportunity to release a small area of the Borough's Green Belt that can assist the Council in meeting the housing needs of the Borough as well as supporting the continued role and function of Meriden as an important rural centre providing access to service and facilities for local people living in Meriden and also within the surrounding rural area.

3 DUTY TO COOPERATE

Legal Requirements under the Duty

- 3.1 Authorities are expected to address strategic issues in local plans and demonstrate how this has been managed through the 'duty to co-operate' process. This is set out in Section 110 of the Localism Act 2011 (inserted into s33A of the Planning and Compulsory Purchase Act 2004), and amplified in National Planning Policy Framework¹ (NPPF) and in the National Planning Practice Guidance² (PPG).
- 3.2 Under section 33A(2)(a) of the Act, all local planning authorities are required, “...to engage constructively, actively and on an ongoing basis...” on any activity in so far as they relate to a ‘strategic matter’. Section 33A(4)(a) of the Act defines strategic matters as being, “...sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas...”.
- 3.3 Also of note is that the legal test is applicable to the preparation of both new and revised development plan documents.

The Duty in a Planning Context – National Policy

- 3.4 The NPPF reiterates that all local planning authorities, “...are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries...” (paragraph 24).
- 3.5 Of significance, the NPPF finally states that,
“...In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency...” (paragraph 27).
- 3.6 A review of the material published by the Council indicates that no such statements have been prepared at the point of publication of the Reg. 19 version of the SLP. It is therefore

¹ Paragraphs 24-27 of the NPPF 2019 ‘Maintaining effective cooperation’

² <https://www.gov.uk/guidance/plan-making>

unclear how the Council has, to this point, met the legal test in the Localism Act that effective and joint working has been undertaken, particularly in respect of unmet housing need from elsewhere in the HMA (as considered further below).

Planning Practice Guidance on meeting the Duty

- 3.7 Further guidance on how local planning authorities can maintain effective cooperation is set out in the updated Planning Practice Guidance ('PPG') published in March 2019.
- 3.8 The PPG sets out additional guidance on the approach local planning authorities should take in addressing the strategic matters that cross authority boundaries, as well as further guidance on the form and content that statements of common ground should take.
- 3.9 As identified in the NPPF, a Statement of Common Ground ('SOCG') is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate and is a way of demonstrating that plans are deliverable over the plan period (Paragraph: 010 Reference ID: 61-010-20190315).
- 3.10 The PPG expects that SOCGs will contain the key strategic matters being addressed by the statement, for example meeting the housing need for the area concerned. It is also expected that SOCGs will contain details of the process for agreeing the distribution of need (including unmet need) across the area covered by the statement, a record of where agreements have (and have not) been reached on key strategic matters, including the process for reaching agreements on these, and also the governance arrangements for the cooperation process including how the statement will be maintained and kept up to date [in order to ensure the process remains 'ongoing' following adoption of the plan]. The SOCGs should also establish clear signposting to the key evidence relevant to the strategic matter in question (Paragraph: 011 Reference ID: 61-011-20190315).
- 3.11 The PPG, nor the NPPF, seek to limit the geographical extent or coverage of the area over which local planning authorities can cooperate during the plan-making process. Nevertheless, it is usual for the general extent of the area to reflect the most appropriate functional geographical area, including defined housing market areas (Paragraph: 017 Reference ID: 61-017-20190315). In the case of Solihull, this would mean the area covering those authorities within the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA').
- 3.12 Under the PPG, it is also expected that local planning authorities should have made the Statements of Common Ground available on their website by the time they publish their

draft plan (assumed to be the Regulation 18 version), in order to provide communities and other stakeholders with a transparent picture of how they have collaborated (Paragraph: 020 Reference ID: 61-020-20190315). As stated above, the Council has not published any Statements of Common Ground so there is no evidence available to support the Council's view that they have met the legal test at this point in time.

Recent Legal Cases – Sevenoaks LP challenge

- 3.13 RPS notes the importance of having a clear evidence base indicating how early discussions on strategic matters have informed the development of the Plan. A number of plans have failed to satisfactorily address the Duty in 2020, with reference drawn to Wealden, St Albans and Sevenoaks, the latter being the subject of a recent legal challenge by the Council.
- 3.14 On 16 November 2020, J Dove dismissed the challenge raised by Sevenoaks Council, that the Inspector's reasoning in her Report (issued in March 2020) was flawed and noted that the Inspector was fully entitled to criticise the Council for failing to cooperate adequately in meeting a projected housing land shortfall. RPS is mindful of the nature of the Duty, as a binary test, which could prevent the Plan from progressing to adoption and would encourage the Council to submit evidence of DtC activities to date, and preferably any SOCGs with appropriate authorities/bodies ahead of submission so as not to leave themselves open to a similar criticism.

Local Plan

Solihull Local Plan Draft Submission

- 3.15 The Solihull Local Plan Draft Submission Plan ('SLP') (Regulation 19) document contains very little information on how the SLP has met the legal test under the Duty. The only references in the SLP merely state that the Council has been working with its partners to address Birmingham's housing shortfall (paragraph 227 refers), as well as references in relation to need to maintain ongoing engagement pursuant to the proposed UK Central Hub Area (paragraph 847 refers).
- 3.16 Given that this iteration of the SLP is the final stage prior to submission for examination, RPS would have expected more detailed evidence on how the Duty has been met, including all the requisite Statements of Common Ground as required by the NPPF. This is currently a significant gap in the Council's evidence base, which undermines the ability of the Council to demonstrate effective engagement has taken place throughout the period of preparing the SLP, as required by the Duty.

Topic Paper on Duty to Cooperate

3.17 The only information regarding Solihull's approach to meeting the Duty is set out in one of the topic papers published alongside the SLP; the 'Overall Approach Topic Paper' (OATP).

3.18 Chapter 6 of the OATP presents a summary of the approach to meeting the Duty and evidence available to date (October 2020). The OATP makes reference to the relevant legislation and the NPPF, including the preparation Statements of Common Ground as a means to demonstrate that effective ongoing engagement has taken place across administrative boundaries. The OATP identifies three areas considered to constitute 'strategic matters', there being:

- UK Central Hub Area proposals;
- Minerals; and
- Housing Need.

Housing Need

3.19 The OATP makes reference to the Council's membership of the Greater Birmingham & Solihull Local Economic Partnership ('GBSLEP') Housing Market Area ('HMA') Technical Officers Group and the production of three position statements on housing need across the wider HMA (paragraph 147 refers).

3.20 However, as highlighted above, it is confirmed in the OATP that the Council is yet to establish any formal common ground with its HMA partners, instead it is merely 'seeking' to do so (paragraph 148 refers). RPS considers that the lack of any clear Statements of Common Ground at this relatively late stage in the preparation of the SLP is a significant gap in the Council's evidence base on meeting its legal obligations under the Duty.

3.21 Similarly, the Council has now committed to a contribution of 2,105 dwellings towards the housing shortfall in the GBBCHMA up to 2031. However, this figure has not been ratified in any SOCG between the Council or its HMA partners prior to publication of the Regulation 19 version of the SLP. RPS also notes that this figure is 'capacity-led' (SLP, paragraph 228 refers) and so is still subject to potential change following the Regulation 19 consultation. Furthermore, it is not clear how the contribution figure has been derived or the extent to which the HMA partners have had an input into the decisions taken in setting it at this level.

3.22 Therefore, in this regard, RPS questions whether enough has been done to demonstrate that engagement between Council and its HMA partners has met the Duty obligations.

3.23 Similarly, RPS is aware that little progress has been made by the GBSLEP authorities to meet the unmet needs of Birmingham and no firm commitments have been made. The

most developed attempt at addressing this need has been made by North Warwickshire who, in their emerging Plan have expressed a commitment to include a contribution of 3,790 dwellings, equating to 10% of the unmet need established at the time. This plan remains at Examination, though on this particular matter, the Inspector is more resolved that the contribution is sound. RPS will turn to the robustness of the Council's contribution elsewhere in this submission.

- 3.24 These concerns go further in relation to how the Council has considered the likely unmet needs of the wider HMA particularly in respect to housing need beyond 2031.

Unmet Needs across Birmingham

- 3.25 As highlighted above, the Council proposes a contribution of 2,105 dwellings towards the housing shortfall across the wider HMA, including Birmingham. When taking into this contribution, this still leaves a shortfall of 2,597 dwellings as set out in the latest Housing Market Area Position Statement³ published in September 2020. However, this ongoing shortfall only relates to the period up to 2031, and does not consider any potential for an emerging shortfall in supply beyond 2031.

- 3.26 Previous evidence published in the GBBC HMA authorities Strategic Growth Study (SGS) February 2018, prepared by GL Hearn⁴, remains the only up to date assessment of housing need and provision for the period beyond 2031 for the HMA as a whole. This study identified a 'residual minimum shortfall' of 47,855 dwellings between 2011 to 2036 to be provided for in addition to all known and assumed sources of supply across the HMA as a whole identified at the time⁵.

- 3.27 The SGS figures (updated in September 2018⁶) suggested a total shortfall up to 2031 of 16,325 dwellings for the period up to 2031. Therefore, it can be deduced that the ongoing shortfall for the period 2031-2036 for the HMA as a whole would be 31,530 dwellings (47,855 minus 16,325). Accepting for a moment that the housing shortfall for the HMA has reduced from 16,325 to 2,597 dwellings, this would reduce the shortfall beyond 2031 by 13,728 dwellings. The net effect of this is to suggest that the ongoing shortfall beyond 2031 could be in the region of 17,802 dwellings (31,530 minus 13,728). However, this does not

³ GBBC HMA Housing Position Statement 3, September 2020

⁴ Greater Birmingham HMA Strategic Growth Study Greater Birmingham & the Black Country *A Strategic Growth Study into the Greater Birmingham and Black Country Housing Market Area*, February 2018

⁵ See Footnote 4, Table 39

⁶ GBBC HMA Housing Position Statement 2, September 2018

take into account the new, emerging shortfall emanating from the Black Country Authorities, which could be in the region of 29,288 dwellings based on current evidence (see below for further discussion on this) up to 2038, of which 7,485 dwellings is predicted to come forward by 2031. This therefore suggests an ongoing shortfall of 21,803 dwellings is likely to emerge beyond 2031 (29,288 minus 7,485).

3.28 The result of this indicates that there could be an emerging unmet need for some 39,605 dwellings across the wider HMA for the period 2031 to 2036 (17,802 plus 21,803). Whilst this figure could change in light of future assessments of local housing need across the HMA-constituent authorities, this clearly indicates that planning for housing need across the HMA as a whole beyond 2031 is a strategic matter of major importance, but this has been overlooked in the preparation of the SLP to date.

3.29 Based on the foregoing analysis, RPS contend that the emerging shortfall beyond 2031 should be given greater consideration in the SLP, given the SLP covers the period up to 2036 and which offers an opportunity for the Council to address the evidence of emerging shortfalls up to that end date.

Unmet needs across the Black Country

3.30 An important aspect of the ability of a strategic plan-making authority (in this case Solihull Borough Council) to demonstrate compliance with the legal test is to address any identified matters of a strategic nature at the time they arise, rather than leaving them to a subsequent plan review. This is particularly relevant respect to the Council's response to the identified housing shortfall across the Black County Authorities, most significantly in the period post-2031.

3.31 In December 2019, the Black Country Authorities published *the Black Country Urban Capacity Review*. The main conclusion from that work was the identification of a significant housing shortfall of between 26,920-29,288 homes up to 2038 that cannot be accommodated in the Black Country urban areas on existing sites or other land sources currently known (paragraph 4.3 of the review refers). The capacity review estimates that 7,485 dwellings of the total shortfall relates to the period up to 2031. In addition, the review also predicts that the shortfall will begin to emerge around the 2027/28 period based on the calculation of housing need using the latest standard methodology (Graph 2 of the review refers).

3.32 This new evidence represents a new focus for all authorities comprising the GBBCHMA, including Solihull, and the need for effective engagement between parties to begin remedying this matter. RPS acknowledges that this evidence has emerged after the previous consultation on the SLP (the Draft Local Plan Supplementary Consultation was

held during January to March 2019). However, the Council has had ten months to consider this new information prior to publishing the Draft Submission (Reg. 19) version of the SLP.

3.33 In response, the OATP states (at paragraph 154) that:

“154. Given the timetable it is the view of SMBC that there remains a significant amount of work to be undertaken to evidence this shortfall and review the overall need in light of recent government changes to the Standard Methodology which, given the timeframes involved, will affect the continued development of the Black Country Plan. Any final shortfall will also be subject to testing through further consultation and public examination. SMBC therefore commits to continuing to work alongside the Black Country Authorities and other members of the wider HMA to review the evidence which supports the unmet need but notes that any outstanding need retains significant uncertainty and is also likely to be relevant towards the latter part of the Plan Period (post 2031 for example). Given the likelihood of a Local Plan review within SMBC prior to 2031 the Council is of the view that this issue can be managed further as part of its next Local Plan review.”

3.34 In addition, the OATP (paragraph 153 refers) makes reference to a letter sent to all members of the GBBCHMA dated 4th August 2020 ‘...regarding the challenges facing the Black Country Joint Plan review in so far as they related to matters of Housing and Employment land supply’. Nonetheless, it is not clear from the evidence presented by the Council that the Black Country authorities have expressly stated that they can address the identified shortfall through other means, for example through releasing Green Belt land from around the edge of the conurbation. Therefore, it is very likely that a shortfall of housing will need to be accommodated outside the four Black Country authority areas, particularly in respect of the period after 2031 up to 2038.

3.35 On this basis, it is clearly incumbent on all the authorities of the GBBCHMA, including Solihull, to engage actively, constructively and on an on-going basis with each other on how to address the significant shortfall in housing needed to meet the needs of the Black Country going forward. As part of the legal test under the Duty, such work should have started at the end of 2019. However, as highlighted in the extract from the OATP above, the Council has made a seemingly unilateral decision to delay any further consideration of the unmet housing needs of the Black Country as part of the SLP until, ‘...its next local plan review.’

3.36 RPS therefore contends that such actions do not accord with the legal test given that the Duty specifically applies to plan preparation which ends once the SLP is submitted for

examination, an issue recognised in the recent *Sevenoaks* high court ruling in November 2020⁷.

- 3.37 Consequently, given the lack of any evidence of any constructive or active engagement to date between the Council and the Black Country authorities on addressing the identified housing shortfall in that area, coupled with the lack of any evidence to demonstrate such engagement during the earlier stages of the SLP (in the form of Statements of Common Ground or other similar documentation), RPS contends that the Council has fallen short of meeting the legal test under the 2011 Act.

⁷ *R on the Application of Sevenoaks District Council v Secretary of State for Housing, Communities and Local Government* [2020] EWHC 3054 (Admin) Case Number: CO/1417/2020, paragraph 24

4 SPATIAL STRATEGY AND RELATIONSHIP TO THE PROPOSED SITE ALLOCATIONS

Solihull Local Plan - Spatial Strategy to 2036

- 4.1 National policy is clear that all plans should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for the development needs of the area, including as well as planning for infrastructure, community facilities and also strategies for conserving and enhancement the natural, built and historic environment⁸.
- 4.2 This usually takes the form of a 'Spatial Strategy' for the area, and provides the overarching basis for the subsequent policies and proposals to guide development during the plan period.
- 4.3 The spatial strategy, as set out in the SLP, seeks to broadly achieve the following:
- to accommodate development needs close to where they arise (paragraph 63);
 - recognising that there is extremely limited land available that could contribute towards a purely 'urban-focus for accommodating growth' (paragraph 64);
 - to therefore strike a balance between concentrating development in a relatively small number of locations and dispersing development over a greater number of locations – a 'balanced dispersal' approach (paragraph 64);
 - to focus significant developments in locations that are, or can be made, accessible and sustainable (paragraph 65), by:
 - locating it adjacent to the urban edge/a highly accessible settlement;
 - locating it adjacent to a settlement that although it may be less accessible, it has a wide range of local services (including a secondary school); or
 - ensuring development that would be a proportionate addition adjacent to an existing settlement that although is less accessible still has a limited range of services available within it (including a primary school) (emphasis added).
- 4.4 By following this strategy, this would provide opportunity for some smaller sites to assist the early delivery of housing during the Plan period and support existing services (paragraph 66), but would also discourage a disproportionate addition to a settlement that only has a limited range of facilities (paragraph 67).

⁸ NPPF 2019, paragraph 20

- 4.5 The latter category of location referred to above includes the settlement of Meriden. Meriden is therefore proposed as a 'rural settlement identified for limited expansion' and is identified on the SLP key diagram.
- 4.6 However, RPS contends that the distribution of development, by way of the proposed site allocations for housing, does not properly reflect the spatial strategy with particular reference to Meriden.

Site Allocations in support of the Strategy

- 4.7 A schedule of the 18 proposed site allocations is presented in the SLP (paragraph 226 refers). Of the total requirement of 5,270 dwellings to be met through site allocations (excluding UK Central Hub Area), 3,175 dwellings are proposed on just four of these, namely Barratt's Farm, Balsall Common (BC1); South of Dog Kennel Lane, Blythe (BL2); South of Knowle (KN2); and East of Solihull (SO1), which represent 60% of the total allocation, and equating to an average of 793 dwellings on these sites. The remaining 14 allocations therefore total 2,095 dwellings (40% of the total allocation), at an average of 150 dwellings on each site.
- 4.8 However, the SLP also proposes to allocate 2,740 dwellings at the UK Central Hub Area. Adding this figure to the quantum of allocations this increases the total to 8,010 dwellings⁹). This now means that 5,915¹⁰ dwellings are to be delivered on just five allocations, resulting in 74% of the total allocation on these five sites. Across these five sites, delivery would average out to 1,183 dwellings, compared to the average of 150 dwellings across the remaining sites proposed for allocation (or 26% of the total allocation figure including UK Central Hub Area).
- 4.9 RPS acknowledges that part of the Spatial Strategy seeks to focus significant developments in locations adjacent to the urban edge and highly accessible settlements, primarily the area of Solihull that is contiguous with the West Midlands conurbation. However, the proposed distribution of development on new allocations, as demonstrated above, would result in just 2,095 dwellings built at locations outside the five largest sites. Over the plan period (up to 2036), this equates to an average of just 131 dwellings each year being built on relatively smaller, non-strategic sites in the Borough.

⁹ 5,270 plus 2,740

¹⁰ 3,175 plus 2,740

- 4.10 It is also worth noting here that the amount of growth allocated to Meriden (100 dwellings) is just 1.2% of the overall total allocation of 8,010 dwellings in the SLP. However, Meriden is one of very few settlements in the east of the Borough, and is the only settlement to the east of the proposed High Speed Rail 2 ('HS2') line. It is therefore critical that the needs of Meriden, and its rural hinterland, are properly met so not to undermine its intended, continued role within the Strategy. However, the level of growth proposed does not reflect the need for a proportionate addition to the settlement consistent with the Strategy. Consequently, a re-focus on smaller settlements and sites is needed to ensure the site allocations approach properly reflects the intentions of the Strategy, and ensure a balance of deliverable supply options.
- 4.11 RPS therefore contends that the significant skew in the overall allocation of land across just five sites in the SLP runs counter to the 'balanced dispersal' approach which seeks to accommodate development needs close to where they arise as advocated as part of the Strategy. As a result of this, the concentration of growth on a relatively small number of strategic sites is also to the detriment of the proportionate addition of growth adjacent to the existing settlement of Meriden, which also forms a key plank of the Strategy.
- 4.12 On this basis, RPS contends that the allocation of sites in the SLP is inconsistent with the Strategy and so is not soundly-based. RPS recommends that further consideration is given to increasing the allocation of land at smaller settlements which are able to accommodate growth to meet local needs in the future, in particular at Meriden, but also to ensure that the SLP is able to maintain a deliverable supply of land throughout the plan period.
- 4.13 RPS submits further representations with respect to the appropriate quantum of growth that should be allocated at Meriden in responses to Policy P5 later in this submission.

5 POLICIES FOR MEETING HOUSING NEEDS – SOLIHULL, MERIDEN AND THE WIDER HMA

Housing Requirement

- 5.1 Policy P5 of the SLP deals with the provision of land for housing to meet the need for new homes over the plan period (2020-2036). The policy seeks to establish a new housing requirement to deliver 15,017 additional homes over the period (which includes 2,105 dwellings of unmet need from the GBHMA), as well as the intention to allocate land to deliver at least 5,270 net additional homes.
- 5.2 RPS notes that the total housing requirement of 15,017 dwellings comprises the minimum local housing need figure (12,912) plus the Council's contribution towards the unmet needs of the HMA (2,105). However, RPS wishes to raise two points in relation to this approach.
- 5.3 Firstly, under the emerging changes proposed by MHCLG to the methodology for calculating set out in the 'Changes to the Planning System' published in August 2020, the local housing need figure for Solihull is likely to increase from 807 dwellings to 1,011 dwellings. This is due to the proposed 'two-step' affordability adjustment which would not only account for current affordability ratios but also for changes in affordability over the preceding period (currently ten years). Therefore, the current estimate of housing need in Solihull used as a basis for the housing requirement proposed in Policy P5 may be insufficient and will require an upward adjustment.
- 5.4 And secondly, it is evident that the scale of affordable housing need identified in the Council's raised questions as to whether the SLP makes sufficient provision for housing, including affordable housing, as required by the NPPF¹¹. Current evidence of affordable housing need for the Borough¹² set out in the *Housing and Economic Needs Assessment October 2020* report (HEDNA) suggests there is a need for 578 affordable homes per annum in Solihull. This equates to 72% of the baseline local housing need of 807 dwellings per annum. On this basis, the HEDNA recommends (paragraph 43 refers) that, "...affordable housing delivery should be maximised where opportunities arise " RPS therefore contends that greater measures should be taken in the SLP to address the scale of need that is recognised as being significant in Solihull in line with its own evidence. This should include setting the housing requirement in excess of the baseline need figure of

¹¹ NPPF 2019, paragraph 20

¹² Solihull Metropolitan Borough Council *Housing and Economic Development Needs Assessment*, October 2020, Table 51

807 dwellings in order to make a meaningful attempt to address the affordable needs of households in Solihull.

Meeting housing needs at the local scale – Meriden

- 5.5 The SLP identifies housing requirements for each designated neighbourhood plan area in the Borough. The figures presented comprise the amount of housing expected to be delivered through site allocations (made in the SLP) in each Neighbourhood Area along with sites identified in land availability assessments, those identified in the Council's Brownfield Land Register and site allocations in the Solihull Local Plan 2013 without planning permission at 1st April 2020.
- 5.6 The SLP proposes a figure of 100 dwellings to be assigned to the Meriden Neighbourhood Plan ('NP') area (paragraph 48 refers). This represents the lowest figure amongst all the NP areas identified, which supports an average delivery of approximately six homes per year between 2020 and 2036. The figure has been identified based on the selection of a single site as a proposed housing allocation in the SLP, which the Council propose to release from the Green Belt. RPS does not agree with the figure as proposed for Meriden.
- 5.7 Planning Practice Guidance recommends that alongside consideration of the spatial strategy and evidence on land availability, consideration should also be given to the characteristics of the neighbourhood area including its population and role in providing services¹³. Meriden is acknowledged as being the only settlement in the north-eastern part of the Borough, and one that provides access to services for the settlement's residents as well those living in the surrounding rural areas of the Borough. However, in setting the figure of 100 dwellings, the Council is ignoring factors such as the characteristics of the population and households living in Meriden and the role the settlement plays in service provision for local people.
- 5.8 Data taken from the evidence informing the Meriden NDP¹⁴ indicates that at the last Census count (2011) there were 1,279 dwellings in the Meriden Parish area, equating to 1.45% of all dwellings in the Borough. This remains the most up to date measure of the number of dwellings in Meriden Parish as a proportion of the overall Borough, until a new Census count is undertaken in 2021.

¹³ Paragraph: 101 Reference ID: 41-101-20190509 Revision date: 09 05 2019

¹⁴ AECOM Meriden Housing Needs Assessment (HNA) March 2019, paragraph 44

- 5.9 When applying this proportional split to the local housing need for the Solihull Borough at 2020 (taken here to be 12,912 dwellings as set out in SLP) this would generate a need for 187 homes¹⁵ in Meriden Parish over the plan period (2020-2036). This would equate to between 11 and 12 additional homes each year in the Meriden Parish area over the whole plan period. This rate of delivery would be around half the average annual number of homes built in Meriden between 2011 and 2018, which saw 160 homes built over that period (or 22 homes per year). If this recent rate of growth is extrapolated over the plan period, this would generate a requirement for 352 dwellings over the (16 year) plan period.
- 5.10 On this basis, RPS contends that a higher housing requirement figure should be assigned to Meriden, which is suggested should be between 187 to 352 new dwellings. This would result in a potential increase in the proportional share of new homes in Meriden ranging from 87 to 252 dwellings, which should be met through a positive strategy for land allocation in the SLP. Such an increase would sit comfortably within the scale of overall increase recommended elsewhere in this submission in order to address the need for greater flexibility in the SLP (of between 650 and 880 dwellings).
- 5.11 Furthermore, setting the requirement at this level would also support Meriden's continued role and function as a local service centre providing access to facilities for Meriden residents and those living in the surrounding rural area.

Meeting the needs of the GBBC HMA

- 5.12 As highlighted already in submissions on the duty to cooperate, the Council is now committing to making a contribution of 2,105 dwellings towards the housing shortfall across the wider HMA within which Solihull sits; the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') (paragraph 228 of the SLP refers). RPS considers that any such contributions should be specifically set out in a development plan policy so that the Council is held account for not meeting such a commitment.
- 5.13 RPS also notes the Council's clarification that this contribution relates solely to the unmet needs of the GBBCHMA up to 2031, which is suggested now sites at 2,597 dwellings. The evidential basis for this stems from the publication of the GBBCHMA Housing Position Statement 3 September 2020 prepared by the 14 local planning authorities that make up the HMA. However, RPS contend that no such confirmation exists for the 2,597 dwelling figure, given that Birmingham City Council has decided to delay any review of its Local Plan

¹⁵ 1.45% of 12,912

for the foreseeable future. The result is that the assumptions that have been applied in order to reduce Birmingham's shortfall from 37,900 to 2,597 dwellings in less than four years have not been tested or scrutinised in a public forum. Such assumptions include seeking to increase densities on existing sites as well as apparent sources based on 'windfalls' within the City (which, by definition, are not yet known to exist). Consequently, whether this changed position for undertaking cross-boundary planning is valid or not has not yet been determined in a fair and open manner and is, in effect, based on a unilateral undertaking instigated by Birmingham City Council.

- 5.14 On this basis, RPS contend that very little weight should be attributed to this changed position in Birmingham's housing shortfall until it has been properly tested and scrutinised in relation to the review of the Birmingham Local Plan, and reliance should be placed on the current formal position which was accepted by an independent Inspector and relates to the base shortfall of 37,900 dwelling shortfall set out in the current adopted Birmingham Local Plan adopted in January 2017 for which that Council considers to remain up to date.
- 5.15 Furthermore, the Council accepts that there is likely to be a significant level of unmet need from the GBBC HMA, including the Black Country Authorities, in the period from 2031 onwards (paragraph 153 of the SLP refers). Current evidence set out in the Black Country Urban Capacity Review December 2019 established a shortfall of up to 29,260 dwellings over the period 2019-2028. The majority of this shortfall (over 20,000) is likely to emerge from 2031 onwards¹⁶.
- 5.16 Other authorities in the GBBCHMA are considering how to address the emerging shortfall from the Black Country. This includes South Staffordshire who are currently a local plan review to cover the period up to 2038. This includes a contribution of around 4,000 dwellings to the unmet needs of the GBBCHMA over that period. This represents a positive response that seeks to address this key strategic matter rather than defer it to subsequent plan update. In addition, some authorities outside the GBBCHMA but who are non-constituent members of the West Midlands Combined Authority (unlike Solihull Council who are a full Constituent Member) are also taking positive action to address the emerging Black Country housing shortfall¹⁷.

¹⁶ Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020), paragraph 4.2

¹⁷ The Shropshire Local Plan Draft Submission (Regulation 19) is currently consulting on a decision 'in principle' to accommodate 1,500 homes and 30 hectares of employment land to assist the Black Country in addressing its unmet need to 2036.

- 5.17 Unfortunately, in the SLP, the Council has decided to ignore the available evidence which points to a significant shortfall in housing within the GBBCHMA that is likely to emerge during the period of the SLP (2031-36). To ignore this matter would be contrary to national policy which requires all plans to set out strategic policies that, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas¹⁸. Furthermore, RPS contends that to ignore this matter undermines the requirement for plans to be positively prepared and which represent effective and on-going joint working between strategic policy-making authorities¹⁹.
- 5.18 On this basis, the lack of effective engagement and consideration of the available evidence on emerging unmet needs within the GBBCHMA is not justified and does not represent positively prepared plan-making. Consequently, the Council's approach to addressing the housing needs of the wider HMA is not soundly-based

¹⁸ NPPF 2019, paragraph 11b(i)

¹⁹ NPPF 2019, paragraph 25

6 HOUSING LAND SUPPLY PROVISION

- 6.1 The policy also sets the expectation that an average of 938 dwellings will be delivered each year over the period. RPS notes that the policy proposes a housing trajectory (set out on page 70 of the SLP) based on the phased delivery of housing over three phases; and average annual delivery of 851 dwellings during 2020-2026 (Phase I); and an average of 991 dwellings delivered during 2026-2036 (Phases II and III).
- 6.2 The SLP therefore proposes to deliver the housing requirement based on a 'stepped' trajectory, which effectively 'backloads' a greater share of the requirement to the period 2026-2036. The reason given in the SLP for proposing this approach is that some of the larger sites will not make a significant contribution to completions until the mid-delivery phase (assumed to be post-2026), and to ensure a robust five year housing land supply for the duration of the plan (paragraph 224 of the SLP refers).
- 6.3 Whilst a stepped trajectory may be appropriate in certain circumstances, it is critical that the SLP ensures that expected delivery rates are achieved in order to prevent under-provision and reduce the risk of housing shortfalls in the later years where higher rates of delivery are planned.
- 6.4 Issues with the use of stepped trajectories has been considered recently in other local plan examinations i.e Guildford. In that examination, the Inspector recognised that a stepped trajectory would deliver housing at a lower rate for several years from the date of adoption (as is the case in the SLP) which would not adequately address the borough's deteriorating affordability and meeting housing needs in the early years of the plan as part of boosting the supply of housing in line with national policy²⁰. To resolve this problem, the Inspector accepted Guildford Council's modification to the plan to allocate additional land in order to increase housing delivery in the early years of the plan and to avoid the need for a stepped trajectory all together²¹.
- 6.5 RPS see clear similarities between this case and that of the approach taken by Solihull Council to planning for housing delivery in the SLP. The recommendation to alter the approach and remove the stepped trajectory in Guildford offers a clear alternative to relying on future plan reviews to remedy any potential under-delivery and to ensure the SLP is effective at the point of adoption. Similarly, the SLP preference for very large allocations i.e

²⁰ Guildford Borough Local Plan: strategy and sites, Inspector's Report 27 March 2019, paragraph 23

²¹ Guildford Borough Local Plan: strategy and sites, Inspector's Report 27 March 2019, paragraph 215

UK Central Hub Area reinforces the need for stepped trajectory which risks the failure of the strategy in the early years of the plan period. This is also clearly evident given that the Council's five year land supply position (5.37 years at 2020) is also reliant on a stepped trajectory rather than identifying sufficient number and range of sites to deliver the housing requirement in the early years.

- 6.6 Therefore, as an alternative to the proposed strategy in the SLP, RPS strongly recommends that greater consideration is given to finding more sites of a small and medium size (100-200 dwelling capacity) and to allocate these for delivery in the early years of the trajectory, thus negating the need for a stepped trajectory in the first place and supporting a healthier five-year land supply position.
- 6.7 RPS therefore has some concerns with the approach set out in Policy P5, in particular the approach to housing land supply over the plan period, and the need for a shorter term injection of smaller sites, that are capable of delivery within the first tranche of the Plan period.

SLP approach to housing land supply over the plan period

- 6.8 The table on page 69 of the SLP identifies the various components of land supply expected to deliver the housing requirement of 15,017 additional dwellings between 2020 to 2036. For reference, this reproduced below.
- 6.9 It is noted that the housing requirement is actually 'capacity' or 'supply' led, as it is merely the total of the ten components of supply shown in the table above. This includes the contribution to the wider HMA of 2,105 dwellings, being the difference between 15,017 and the latest local housing need figure for Solihull (12,912 dwellings) set out in the table on page 68 of the SLP. It is therefore the case that, once the HMA contribution is accounted for, the total amount of land supply (including the allowances for windfalls and non-implementation) identified in Policy P5 to address local needs effectively matches the calculation of local housing need for Solihull Borough under the standard method.

Solihull Housing Land Supply 2020-2036 (as of 1st April 2020)

Source	Capacity
1 Sites with planning permission (started)	1,663
2 Sites with planning permission (not started)	1,119
3 Sites identified in land availability assessments	320
4 Sites identified in the brownfield land register (BLR)	77
5 Town Centre Sites ²⁹	961
6 Solihull Local Plan (2013) allocations without planning permission at 1 st April 2020	350
7 Less a 10% to sites with planning permission (not started), sites identified in land availability assessments, BLR and SLP sites	-283
8 Windfall housing land supply (2022-2036)	2,800
9 UK Central Hub Area to 2036	2,740
10 Allocated Sites to 2036	5,270
Total Estimated Capacity (rows 1-10)	15,017

Figure 6.1 Housing Land Provision in the SLP – Components of Supply

- 6.10 Based on this analysis, RPS has concerns that the Council has not built into the SLP any measure of flexibility in the overall supply, relying entirely on the delivery of housing for all sources identified above.
- 6.11 Similarly, the Council's approach to the windfall allowance equates to 18.6% of the total housing requirement. RPS questions the merits in relying so heavily on currently sources unknown as the second largest component of the overall supply (behind the site allocations). Furthermore, it is not made clear whether there is any site size limit applied to this allowance. Without clarification on the likely size of windfall that would fall into this component of the supply RPS contend that there is clear risk of double-counting against other components in the supply i.e categories 2 to 5 as shown above.

Need for Greater Flexibility

- 6.12 The consequence of the approach set out under Policy P5 is that the SLP has built in just 2.2% flexibility into the supply in order to meet Solihull Borough's part of the housing requirement (12,912), or just 1.9% against the total housing requirement (15,017). This is represented by the inclusion of a 'non-implementation' discount of 283 dwellings in the supply.
- 6.13 RPS contends that this is inadequate and provides virtually no contingency against the under-delivery of housing where circumstances result in delays or slower rates of delivery than are anticipated in the SLP. This is particularly important given that the SLP now proposes a radically different strategy for growth linked to HS2 and the UK Central Hub Area proposals, which has its own allocation of 2,740 dwellings. In addition to this, there is

the proposal for an additional 3,165 dwellings to come forward on new site allocations to address Borough-wide need (5,270 minus 2,105), and a windfall allowance of 2,800 dwellings.

- 6.14 With the exception of the non-implementation discount as it relates to the existing supply components that did not have permission at April 1st 2020 (shown in rows 3-6 in the table above), the SLP contains no allowances or buffers in relation to the future supply from land allocations. Nevertheless, based on meeting the needs of the Borough only, the total supply from new allocations would equate to 5,905 dwellings (2,740 plus 3,165). This represents 46% of the overall supply required to meet local needs, with 21% of the local need to be met at UK Central Hub.
- 6.15 RPS contends that this places a considerable reliance of meeting future need from those element of supply that yet to have planning permission nor which are in a position to be brought forward at this time. Such flexibilities are a common aspect of managing uncertainties around future land supply. Other plans in the sub-region have included such allowances, for example Stratford-on-Avon, and more recently Telford & Wrekin. In Telford, the local plan²² (adopted in January 2018) specifically includes a flexibility allowance of 20% applied to the site allocations as well as to those sites with planning permission that had yet to commence at the point of adoption.
- 6.16 RPS considers that additional contingency measures, in the form of an allowance for flexibility, should be applied to the allocations component included in the land supply provision table in the SLP, in order to cater for currently unforeseen and unknown circumstances and events that result in delays or slowdown in anticipated delivery rates. It is noted that the Draft SLP included reference to an 11% margin of supply compared to the requirement proposed at the time²³, but this has not been progressed into the Draft Submission SLP version.
- 6.17 On this basis, RPS contends that (as a minimum) an 11% flexibility allowance should be applied to the site allocations required to meet the Borough-wide need of 12,912 dwellings up to 2036. This would equate to an additional allocation of 650 dwellings. Furthermore, to ensure that the housing requirement including the wider HMA contribution is also given the best chances of being delivered, the allowance should be increased to 880 dwellings

²² https://www.telford.gov.uk/info/20451/development_plans/1229/telford_and_wrekin_local_plan_2011-2031

²³ Greater Birmingham and Black Country Housing Market Area (GBBCHMA) Housing Need and Housing Land Supply Position Statement (July 2020), Table 4

(representing 11% of the 8,010 dwellings from new site allocations proposed in the SLP). By including such an allowance, this would build-in the necessary contingency measures needed to ensure the best possible chance of delivering the new housing requirement.

7 GREEN BELT

7.1 The Council sets its approach to the Green Belt in Policy P17 of the SLP. The key evidence base informing the policy is contained in the Council’s Strategic Green Belt Assessment (‘SGBA’), prepared in 2016. The SGBA comprises a main report and a series of appendices which detail the assessment of broad areas and refined parcels of land across the Borough.

Assessment findings for Meriden

7.2 The area of Green Belt around Meriden falls within the broader area of Green Belt known as the ‘Meriden Gap’. The Meriden Gap establishes and maintains a strategic separation of land between the urban areas of Solihull and Coventry. Meriden settlement is nonetheless inset from the Green Belt within the adopted and emerging SLP, meaning it excludes the existing built-up area of the settlement from Green Belt protections. The extract from the adopted SLP 2013 (Spatial Portrait) below (Figure 7.1) shows the full extent of the Meriden Gap, which covers a substantial area of the Borough to the east of the built-up area (as shown in green hatching). Meriden can also be seen as the settlement located in the north-eastern part of the Borough.

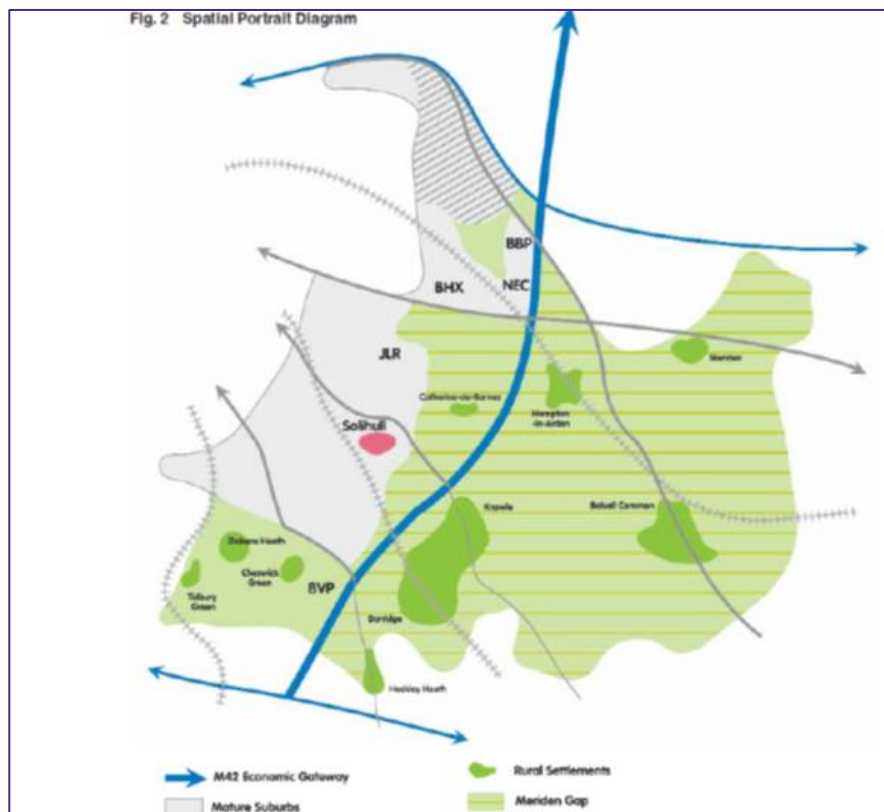


Figure 7.1 Solihull Local Plan (Reg.19) – Spatial Strategy

7.3 The SGBA assessed three parcels of land (defined as ‘refined parcels’) at Meriden. The extract (left) below shows their location, taken from Appendix F of the assessment, and the

overall scores attached to each parcel. The other image (right) shows an extract from the SLP Reg 19 policies map for the same area.

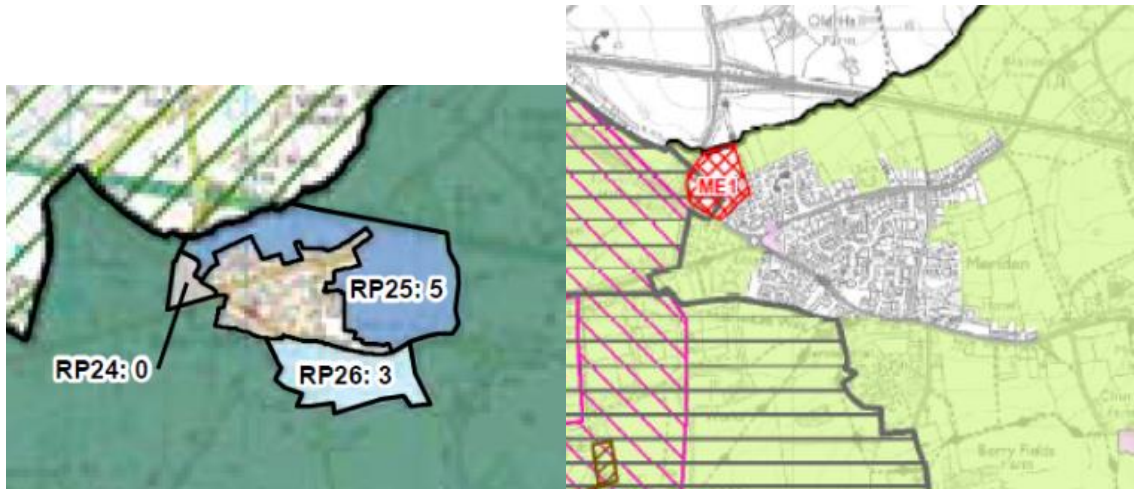


Figure 7.2 Overall Score for Refined Parcels at Meriden (SGBA 2016); Extract from SLP Reg 19 Policies Map

7.4 As can be seen from the above (Figure 7.2), the three parcels scored differently against the Green Belt purposes. Parcel RP24 scored the lowest (zero) primarily due to it being already built out with development (comprising residential uses on the site). Parcel RP25 scores the highest (five) against the Green Belt purposes, whilst Parcel RP26 (which includes the land being promoted by Redrow and to which these representations are in support of) scored less than RP25.

7.5 The table below (Table 7.1) summarises the comments on Parcel RP26 from the Strategic Green Belt Assessment Report (July 2016) against each purposes of the Green Belt purposes (comments in italics are taken directly from the report), with the rating for RP25 for comparison. 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.

7.6 It can therefore be seen that, despite RP25 scoring the highest of the three parcels assessed at Meriden, part of this parcel has been preferred to RP26. This is in spite of RP25 scoring considerably higher (score of 3) in relation to checking the unrestricted sprawl of large built-up areas (GB Purpose 1) compared to RP26 (which scores 1).

Purpose of the Green Belt	Rating for RP26	Commentary	Rating for RP26	Rating for RP25
a. to check the unrestricted sprawl of large built-up areas	1 - Ribbon/other development is already present and/or other development is detached from the existing built-up area with no clear Boundary.	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.	1	3
b. to prevent neighbouring towns merging to one another	1 - Refined Parcel represents gap of more than 5 kilometres between urban areas.	Refined Parcel RP26 forms part of the Meriden Gap separating Coventry to the east from Birmingham and Solihull to the west.	1	1
c. to assist in safeguarding the countryside from encroachment	1 - Refined Parcel is adjoined by countryside and has development present	Refined Parcel RP26 is characterised by countryside but it's adjoined by developed land and has development present.	1	1
d. to preserve the setting and special character of historic towns	0 - Refined Parcel is not within or adjacent to a Conservation Area within a historic town	Refined Parcel RP26 is not within or adjacent to a Conservation Area or historic town.	0	0
Total Score against the GB Purposes			3	5

Table 7.1: Summary of comments on Parcel RP26 from the Strategic Green Belt Assessment Report (2016)

7.7 Similarly, RP26 (in which Land off Main Road is located) makes less of a contribution towards the purposes of Green Belt than RP25 and so the preferred direction of growth at Meriden should be south of the settlement, rather than northwards as is being proposed in the SLP. Furthermore, releasing RP26 (or the part of RP26 in Redrow’s control) would not detrimentally impact on the purposes given the low scoring of the parcel as a whole. RPS therefore contend that releasing land within this parcel would not undermine the function of the Meriden Gap at the strategic scale.

7.8 On this basis, RPS therefore questions the logic in allocating land to the north of Meriden in preference to other sites at Meriden (i.e at Land off Main Road) in Green Belt terms. Further representations on this matter are set out in the next chapter which considers the site assessment approach.

8 SITE ASSESSMENT AND SELECTION

Summary of the Council's Overall Approach to Site Assessment

- 8.1 The Reg 19 Draft Local Plan: Site Selection Process Topic Paper sets out the Council's approach to the site selection process. The topic paper identifies the key pieces of evidence that informed the site assessment process, these being: Strategic Housing and Employment Land Availability Assessment ('SHELAA') - (PBA Report 2016); Accessibility Study (updated in 2020); Strategic Green Belt Assessment ('SGBA') (Atkins Report, 2016); Landscape Character Assessment ('LCA') (Waterman Report 2016); Assessment against a 'Constraints and Opportunities' Plan (SBC); Sustainability Appraisal ('SA') (AECOM Report 2020)
- 8.2 The paper confirms that the site selection methodology was been split into 2 steps:
- Step 1: Using a 'site hierarchy' which gives highest priority to previously developed sites in the urban area and lowest priority to isolated greenfield Green Belt sites; and
 - Step 2: Using 'other considerations and planning judgement' to refine site selections.
- 8.3 The Council's assessment and commentary in relation to the Site is set out separately in the Site Assessment Report ('SAR'), dated October 2020.

Summary of the Assessment of Land off Main Road, Meriden

- 8.4 Following the submission of the Site through the call for sites process, the Site has been given the reference '522' in the SHELAA. Set out below (Figure 8.1) is an extract from the SAR (at page 124) showing the site boundary and location.



Figure 8.1 Site location plan (Land off Main Road, Meriden) taken from the SHELAA 2020

Constraints

- 8.5 Under 'Policy Constraints', the SAR identifies the Site as being located within the Green Belt and also flags up the presence of the Site within a Minerals Safeguarding Area ('MSA'). Against 'Soft Constraints' the Site is noted as having a Public Right of Way ('PROW') running through it. In respect of MSA and the PROW, whilst these may be features that may relate to the Site, these should not prevent their consideration for allocation or their potential for development in the future.
- 8.6 RPS notes that no other significant constraints have been identified that would prevent the allocation of the Site in the SLP.

Evidence

SHELAA (2016)

- 8.7 In relation to the SHELAA, the SAR defines the Site as being a 'category 1' site. This means the Site is considered to "...perform well against the suitability, availability and achievability assessments. Affected by fewest constraints and considered to be deliverable. Sites would be available within 5 years...". RPS broadly agrees with this assessment.

Accessibility Study (AS)

- 8.8 The AS found the Site to be 'high/very high' in terms of accessibility to a range of local services and facilities, including the local primary school, health facilities and public transport links. RPS agrees with these findings, which clearly demonstrate the relative sustainability of the Site and how well located it is to the existing facilities in Meriden.

Strategic Green Belt Assessment (SGBA)

- 8.9 As discussed earlier in this submission, the Site is located within Parcel RP26 in the SGBA. The findings show that RP26 is a "...lower performing overall with a combined score of 3. Lower performing in terms of purposes 1, 2 and 3...".
- 8.10 RPS broadly agree with these findings, which demonstrate that KP26 makes a lesser contribution to the Green Belt purposes than other parcels at Meriden (i.e KP25) as well as other parcels across the Borough.

Landscape Character Assessment (LCA)

- 8.11 The SAR makes reference to the findings from the LCA. The Site is in a Landscape Character Area (LCA) defined as 'LCA 4 – Rural Centre'. This LCA category is split into sub-areas. The Site falls within 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'. The sub-area also has an overall 'very low' landscape capacity to accommodate change.

8.12 Whilst the findings are noted, RPS does not agree that they have been applied in a reasonable manner. As shown below (Figure 8.2), the sub-area within which the Site falls covers an extensive area of the Borough. This is shown in the extract taken from the LCA set out below.

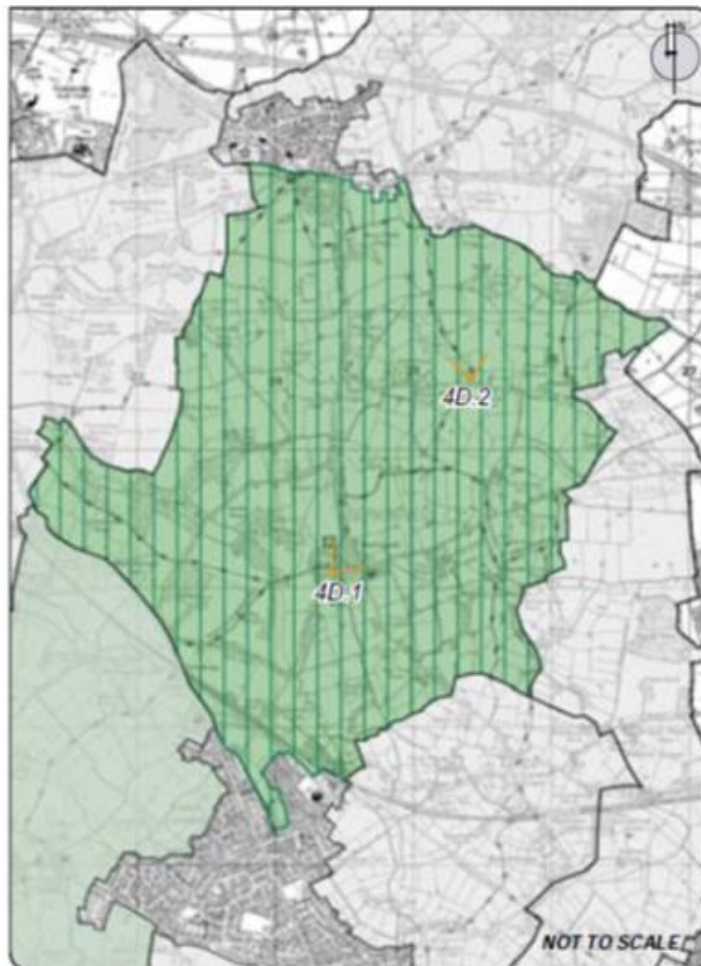


Figure 8.2 Extract from Solihull Landscape Character Assessment (2016)

8.13 The image above shows Meriden as the settlement located outside but adjacent to the northern edge of sub-area 4D. The Site itself is located on the inside of that boundary and therefore should be considered to be at the margins of the sub-area. Furthermore, the LCA does not consider any further refinement to the sub-areas to reflect smaller areas of land that are located specifically adjacent to existing settlements, which is inconsistent with other assessments which have done this i.e. SGBA (RP26).

8.14 On this basis, RPS does not accept that the overall findings adequately reflect the potential effects the Site may have on the wider landscape across the sub-area as a whole. To do

so would be to apply the findings in an overly-prescriptive and rigid manner that does not take into the specific locational characteristics of the Site.

Sustainability Appraisal (site-specific)

- 8.15 RPS notes the references in the SAR to the outcome of the Sustainability Appraisal (SA) of the Site. The latest iteration of the SA is the Solihull Local Plan Review Pre-submission version Sustainability Appraisal (SA Report), September 2020 (though it is noted that the appendices dealing with site pro-formas is dated October 2020).
- 8.16 The most up to date summary for the Site (reference no. AECOM233 in the SA, and is described as ‘South East of Meriden’) is set out in Chapter 7 of the SA (‘Appraisal of sites for potential allocation’), at page 120 of the main report. The detailed appraisal findings are set out in Appendix E to the main SA report. The summary table below (Figure 8.3) shows the scoring for the Site against the SA Framework (as set out in Table 2.4 of the SA).

Site ID	Site Name	SA1: Regeneration and economic development	SA2a: Distance to Primary School	SA2b: Distance to Secondary School	SA3a: Proximity to bus and train services	SA3b: Proximity to principal road network	SA4a: Soil	SA4b: Minerals	SA7: Flooding	SA9: Enhance ecological sites	SA10: Landscape sensitivity	SA11: Enhance green infrastructure (2016)	SA11a: Distance to Greenspace >2ha (2016)	SA11b: Distance to Greenspace >20ha (2016)	SA12: Enhance and protect historic assets	SA14: Amenities	SA16: Housing Delivery	SA17a: Distance to healthcare	SA17b: Access to leisure facilities	SA19a: Distance to Key Economic Assets	SA19b: Distance to convenience stores or supermarket
233	232	South East of Meriden	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Yellow

Figure 8.3 Summary of Scoring for Land off Main Road against the SA Framework

- 8.17 As can be seen, the Site performs relatively well against the majority of SA Objectives, with no significant negative effects being predicted. Nonetheless, RPS would question the score of ‘neutral’ against SA Objective 16 (Housing Delivery). A neutral score suggests that the Site’s deliverability is uncertain. However, the call for sites submission made on behalf to the landowner in March 2019 for the Site clearly indicates that the Site could come forward in the next five years (with commencement possible during 2023). This would categorise the Site as ‘deliverable’ in planning terms.
- 8.18 On this basis, the score of ‘neutral’ should be amended to ‘green’ to reflect the more accurate representation of the Site’s development potential.
- 8.19 In summary, the SA published alongside the SLP would therefore score the Site with 7 negative effects; 8 neutral; and 4 positive (one significantly positive), if amended in line with this submission. However, RPS notes that the SAR indicates a different, and much more negative sustainability score for the Site, which shows the Site having 15 negative effects and only 1 positive effect. However, it is not clear where the scores quoted in the SAR have originated from. RPS therefore questions the inconsistency between the various reports,

which has appeared to influence the overall assessment for the Site as a potential site allocation for inclusion in the SLP.

- 8.20 Based on the above, RPS does not accept that the Site performs in sustainability terms in the way suggested by the Council (as set out in the SAR) and therefore the report needs to be amended to properly reflect the outcome of the latest iteration of the SA.

Site Selection

- 8.21 This element of the paper summarises the conclusions drawn from Step 1 of the site assessment, and the application of ‘other considerations and planning judgement’ under Step 2.

- 8.22 Based on the findings from Step 1 of the assessment, the SAR identifies the Site as a ‘priority 5’ site. This means the Site is categorised as being ‘Greenfield in an accessible lower performing Green Belt location’. Accordingly, the Site has been given a rating of ‘Y’, which means the Site has ‘potential’ for inclusion as an allocation in the SLP.

- 8.23 However, after undertaking its refinement exercise under Step 2, the Council has judged the Site as ‘not to be included in the plan’. According to the Council, this means that the development of the Site has ‘...severe or widespread impacts that are not outweighed by the benefits of the proposal...’.

- 8.24 In coming to this conclusion, the Council states in the SAR (at page 125) that:

“The site has high level of accessibility, being close to amenities and public transport routes (bus). It is within a lower performing parcel in the Green Belt Assessment. However, it lacks defensible boundaries and development of the site would be a significant incursion into the surrounding Green Belt. It is within an area of high landscape sensitivity with low capacity for change. The Sustainability Appraisal scores the site with 15 negative effects (4 significant and 1 positive.” [emphasis added]

- 8.25 RPS does not accept that this conclusion represents a fair reflection of the attributes and characteristics of the Site and also contradicts part of its own evidence. Most significantly, the Council suggests that the Site ‘lacks a defensible boundaries and development would be a significant incursion into the surrounding Green Belt.’ However, the Council’s own evidence in the SGBA does not identify such concerns. In this regard, it is important to note that the southern and eastern boundaries of the Site are formed by an existing boundary that separates two fields. This provides a clear opportunity to enhance the existing Green Belt boundary at Meriden through appropriate planting and other landscape measures as part of the overall design and layout for the Site. Such a response would be entirely appropriate in policy terms, as has been demonstrated by the recently adopted South

Staffordshire Site Allocations Plan, where the provision of defensible landscape boundaries is a key development requirement to be applied to all housing site allocations²⁴.

8.26 Furthermore, the Site is bounded on the northern and western boundaries by existing development, with the boundary tapering to the eastern edge of the Site. This reduces how the parcel performs against the third purpose of Green Belt (to assist in safeguarding the countryside from encroachment).

8.27 RPS therefore contends that that a defensible boundary can be achieved at the Site and can be secured through appropriately worded policy criteria in the SLP akin to other local plans in the West Midlands. Furthermore, the conclusion that the development of the Site would be a significant incursion into the Green Belt is also not justified on the available evidence. The illustrative plan for the Site (Figure 8.4) clearly shows that a defensible boundary can be achieved in this location and is not a reason therefore to exclude the Site from being allocated in the SLP.



Figure 8.4 Land off Main Road, Meriden – illustrative framework for the site

8.28 In terms of the landscape justification for excluding the Site, RPS suggests that the conclusion merely repeats the reference to the Site’s location within an ‘area’ of landscape sensitivity, but does not draw any conclusions on the sensitivity of development specifically

²⁴ South Staffordshire Site Allocations Document (SAD) adopted September 2018 (Policy SAD9: Key Development Requirements)

on the Site itself. Therefore this statement does not assist in judging the merits of the Site in landscape terms.

- 8.29 As discussed above, there also appears to be an inconsistency between the outputs from the Sustainability Appraisal (September/October 2020) and the Site Assessments Report in relation to the Site. This is significant as the overall commentary in the SAR refers to '15 negative effects (4 significant and 1 positive)' as part of the justification for excluding the Site from inclusion in the SLP. However, the SA itself identifies only 7 negative effects with none of them predicted to be 'significant' in nature.
- 8.30 Similarly, the identification of nine sites as 'reasonable alternatives' at Meriden in the SA report²⁵ would suggest that there are many potential sites that could be allocated at Meriden, suggesting that the Spatial Strategy should be revisited with a greater focus on growth at Meriden.
- 8.31 In summary, RPS therefore contends that the basis for excluding the Site from inclusion in the SLP as presented in the SAR is flawed, and so is not justified. On this basis, the approach taken to excluding the Site from allocation in the SLP is not soundly-based.

²⁵ Solihull Local Plan Review Pre-submission Sustainability Appraisal: SA Main Report September 2020, Chapter 7, page 120

9 REPRESENTATIONS ON OTHER POLICIES

9.1 RPS has reviewed the remainder of the Draft Submission SLP and has concerns with aspects of a number of policies in the document. These are set out below.

Policy P1 UK Central Solihull Hub Area

9.2 Policy P1 sets out the overall policy framework for the UK Central Hub Area ('UKCH') proposals centred around the NEC and Arden Cross areas of Solihull Borough (which are the focus for residential development at the UKCH area). RPS notes that the SLP expects to deliver 2,740 additional homes within the UKCH area during the plan period up to 2036. This expected delivery target is set out in Policy P5, to which RPS has set out representation on that policy earlier in this submission.

9.3 RPS acknowledges that the proposals for the UKCH area will result in significant changes in the Borough over the next three decades or so (with the overall vision for the UKCH spanning the period up to 2047). Consequently, the SLP recognises the importance of the need for flexibility given the time period that development is expected to cover, which will extend beyond the plan period (paragraph 85 refers), and the 'uncertainties' about what may take place in the later years (paragraph 88 refers). RPS broadly agrees with this recognition, in particular the need for the plan to be flexible enough to be able to deal with changing circumstances, as required by national policy²⁶.

Housing provision at UKCH Area

9.4 In respect of housing provision, the justification for the specific housing target of 2,740 dwellings is briefly explained in the SLP (paragraph 89 refers). The SLP states:

"89. For purposes relating to housing land supply it has been assumed that across the whole UKC Solihull Hub Area there will be 2,740 dwellings coming forward in the plan period. This will be 2,240 at the NEC and 500 at Arden Cross based on the NEC masterplan (2018) and the emerging Arden Cross masterplan (2020)."

9.5 The Council is therefore relying on the two separate masterplan documents quoted above as the basis for the overall quantum and the split in provision across the two sites. However, having reviewed these two masterplan documents, it is not clear how or where the figure of 2,740 dwellings has been derived from. The NEC Masterplan November 2018 states (on page 34):

²⁶ NPPF 2019, paragraph 33

“Contemporary apartments provide an attractive place to live in unique setting, and will bring a new community at the heart of NEC city. There is potential to accommodate up to 2,500 homes dependent on market conditions. A mix of 1, 2 and 3 bedroom apartments is envisaged...” [emphasis added]

- 9.6 It is clear that achieving this level of growth will be dependent on the establishment of a new sub-housing market, where currently none exists, in this part of the Borough, and which will be heavily reliant on the delivery of the HS2 proposals. However, it is not clear from the available evidence whether any real analysis has been undertaken to demonstrate the feasibility of making a new housing market in and around the NEC and, most importantly, whether it is realistic to expect the delivery of 2,240 new homes based almost exclusively on the provision of apartment accommodation and that can also deliver the amount of affordable housing required under separate policies in the SLP.
- 9.7 RPS assumes that the delivery of 2,500 homes is envisaged to cover the entire masterplan period up to 2047, which equates to an average of 86 homes per year over the entire 29-year period of the masterplan (2018-2047). On this basis, RPS would suggest that the expected delivery over the plan period (2020-2036) would indicate a total of up to 1,380 homes could be delivered by 2036 based on the assumed level of growth in the masterplan.
- 9.8 Consequently, RPS contends that the figure of 2,240 dwellings to be built at the NEC is not justified based on the evidence identified by the Council. The difference between these two figures (860 dwellings) represents a sizeable potential shortfall in the expected delivery of new homes at the UKHC area, which further demonstrates the need for additional sites to be allocated elsewhere in the Borough, including for reasons of flexibility. RPS also questions the realism of delivering the expected scale of growth envisaged in the SLP in an area by 2036 where no housing market currently exists.

Policy P4A Meeting Housing Needs – Affordable Housing

- 9.9 RPS notes that ‘Policy P4’ is in actual fact five separate policies, as these all deal with discrete areas of housing policy.
- 9.10 Policy P4A deals with the proposed approach to securing affordable housing on sites of 10 dwellings or more. The policy proposes 13 separate criteria to be applied to new schemes. Criterion 11 states:
- “The cost of the Council’s qualified valuer will be met by the applicant.”*
- 9.11 RPS does not agree with this approach. It is acknowledged that national policy requires the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Nonetheless, it may be the case that the

requirement(s) under this policy would, in fact, lead the decision-taker to conclude that viability of development is threatened and that the policy requirement should not be sought based on that evidence. In such cases, the costs should not fall wholly on the applicant and should, at the least, be shared equitably between the applicant and the Council.

9.12 Criterion 12 of Policy P4A states:

“The mechanisms and criteria for the delivery of Policy P4A will be set out in the Meeting Housing Needs Supplementary Planning Document.”

9.13 RPS suggests that this is an unfortunate turn of phrase, which is suggesting that the ‘mechanism and criteria’ for implementing the policy should be set out in a supplementary planning document (SPD). Such an approach is clearly contrary to national policy and practice guidance, which clearly define supplementary planning documents as not forming part of the development plan but which provide detail in support of it²⁷.

9.14 On this basis, RPS suggest the criterion be deleted as it is contrary to national policy and so is not soundly-based.

Policy P4C Meeting Housing Needs – Market Housing

9.15 The NPPF states that:

“62. ...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes...”

9.16 It is clearly that the case that local plan policy should be suitably flexible and able to respond to changing circumstances, and written in a way that is informed by the assessment of local housing needs, in particular the needs of specific household groups.

9.17 However, RPS notes that Policy P4C seeks to control the mix of housing proposed on new schemes by prescribing a specific mix of open market housing on all allocated and other major development sites (set out in criterion 3 of the policy). RPS objects to the inclusion of a specific housing mix as proposed on the basis that it is overtly-prescriptive and could be counter-productive to the speedy delivery of housing where the criterion is either not appropriate or unjustified in the particular case involved. On this basis, RPS contend that

²⁷ Paragraph: 008 Reference ID: 61-008-20190315 Revision date: 15 03 2019

the policy criterion 3 is inflexible, not positively-prepared, and therefore not soundly-based. RPS notes the reference to flexibility in the reasoned justification to the policy in the SLP (paragraph 187 refers), and this should be reflected in the policy wording itself.

- 9.18 As an alternative, RPS would suggest that a more positively-prepared policy should 'seek or encourage' the provision of a specific mix or a particular housing type to address particular needs where they arise, rather than promoting a blanket 'policy by diktat'.

Policy 4D Meeting Housing Needs – Self and Custom Build

- 9.19 RPS notes the proposed requirement for 5% of open market dwellings on sites of 100 dwellings or more to be made available for self and custom build plots. The policy then sets out a number of criteria to be taken into account in coming to an appropriate contribution on individual proposals.

- 9.20 Most notably, criterion 2 of the policy also requires plots to be 'offered for sale' for a period of 12 months with such plots being 'fully serviced to the boundary and unconstrained access to the highway' already provided.

- 9.21 RPS objects to the approach under criterion 2 as being overly restrictive and onerous in nature, on the basis that demand for plots on any given development is likely to reflect wider demand for housing generally and which may change over time. Therefore, at the point a particular scheme is approved there may or may not be a demand from people to take on a plot on that site in that location, for whatever reason i.e location, access to funding etc. Under such circumstances, such plots may not be required and will remain so regardless of how long the plot is made available for sale.

- 9.22 RPS contends that the demand (or otherwise) for specific plots should be established prior to installing the necessary infrastructure connections to support the build out of the plot. This would save the applicant/builder the costs of unnecessary upfront works that may not be required, and is considered a reasonable approach.

- 9.23 On this basis RPS suggest that the wording in criterion 2 of the policy should be deleted or amended to reflect these comments.

Policy P7 Accessibility and Ease of Access

- 9.24 The SLP (paragraph 267 refers), by reference to national policy, recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas and this should be taken into account in the preparation of plan policies. This is important in the context of Solihull Borough, which both urban and rural in character and extent.

9.25 However, Policy P7 draws no distinction between urban and rural locations in devising the criterion for assessing proposals in terms of accessibility, resulting potentially in the unfair treatment of proposals brought to meet the needs of the rural area. Therefore, RPS contends that the approach set out in Policy P7 is not consistent with national policy and so is not soundly-based.

Policy P9 Mitigating and Adapting to Climate Change

9.26 This policy sets out a myriad of requirements on new development covering non-energy and energy-based development uses. The policy includes seven criteria covering strategic and site-specific matters to be addressed through new development.

9.27 Criterion 3 is site-specific in nature and includes eight sub-criteria, most of which are applicable to residential development. Criterion 3(i) requires all new dwellings to achieve 30% reduction in energy demand/carbon reduction improvement over and above the requirements of Building Regulations Part L (2013) at the time of commencement up to March 2025, and from April 2025 for all new dwellings to be net zero carbon (criterion 3(ii)). However, it is not clearly stated in the reasoned justification what the basis for this approach is nor that it would not undermine the deliverability or viability of development.

9.28 Without such justification in the SLP, criterion 3 (i) and (ii) should be deleted or amended to recognise that not all proposal will be able to achieve these new standards without undermining their viability. On this basis, the wording should be adjusted to introduce a measure of flexibility in this regard.

Policy P17 Countryside and Green Belt

9.29 National policy seeks to protect and enhance ‘valued’ landscape and other sites of biodiversity and geological value and soils commensurate with their statutory value or identified quality in the development plan. It also requires local planning policies to recognise the ‘intrinsic’ character and beauty of the countryside, as well as the economic and other benefits of the best and most versatile agricultural land. On this basis, it is clear that any protections to be applied to the countryside must be in response to an identified value or something intrinsically important to that location.

9.30 The first criterion of Policy P17 states:

“The Council will safeguard the “best and most versatile” agricultural land in the Borough unless there is an overriding need for development that outweighs the loss, and will seek to protect the character of the countryside.”

9.31 Based on the policy as drafted, RPS contends that Policy P17 is seeking to apply a blanket protection to all areas of the countryside regardless of their ‘intrinsic’ character or ‘value’.

Furthermore, the Council seeks to establish as a matter of principle the protection of best and most versatile agricultural land (BMV) without identifying those areas it considers to be worthy of safeguarding in such a manner. This approach is therefore inconsistent with national policy, which does not seek to prevent development on land classes as BMV, simply that policies should recognise its economic and other benefits²⁸.

- 9.32 Without a clear evidence base to inform the policy criterion, RPS suggest that the wording is either deleted or is amended to properly reflect national policy and the available evidence.

Meriden – Proposed Approach

- 9.33 The SLP presents its 'proposed approach' to future development at Meriden (paragraphs 750 to 758 refers).
- 9.34 In line with representations made elsewhere in this submission, RPS objects the proposed approach for Meriden settlement. On the basis of these representations, RPS contends that additional growth should be directed to Meriden primarily to meet the proportionate needs of the future population and households of Meriden and its hinterland, but also to assist in addressing the need for greater flexibility in terms of the number and size of site allocations, as well as the need for more land to be allocated in the eastern parts of the Borough (of which Meriden offers the only suitable settlement location in this part of the Borough).
- 9.35 A clear additional or alternative site that can address all these factors is Land off Main Road, Meriden. Like the proposed allocation site (Policy ME1), the Site is currently within the Green Belt but is considered by the Council to be 'lower performing' in the Solihull Strategic Green Belt Assessment (SGBA) Report 2016. Like ME1, the Site is relatively well located to existing facilities and services in Meriden, and offers good outcomes in relation to the Sustainability Appraisal for the Site. Notably, the Site is not impacted by flood risk (unlike ME1) as it is located in Flood Zone 1, but nonetheless offers clear opportunity for enhancements through provision of sustainable drainage measures (SuDs) as well as potential compensatory improvements in response to the reduction in Green Belt area following the release of the Site.

²⁸ NPP F 2019, paragraph 170(b)

9.36 On this basis, Land off Main Road should be given greater consideration as a reasonable alternative at Meriden in response to the shortcomings with the SLP identified in this submission.

10 CONCLUSIONS

- 10.1 The representations set out in this submission have been prepared by RPS on behalf of Redrow Homes Limited, with respect to Land off Main Road, Meriden. The submission highlights a number of issues that raise concerns regarding the legal basis and soundness of the Solihull Local Plan (SLP). In summary, these are as follows:
- 10.2 In relation to the legal test under the Localism Act 2011 ('Duty to Cooperate'), RPS contends that there is a lack of any evidence of any constructive or active engagement to date between the Council and the HMA authorities, including the Black Country authorities on addressing the identified housing shortfall in that area (current estimates indicate this to be up to 29,260 dwellings by 2038), coupled with the lack of any evidence to demonstrate such engagement during the earlier stages of the SLP (i.e. statements of common ground or other similar documentation). On this basis, RPS contends that the Council has fallen short of meeting the legal test under the 2011 Act.
- 10.3 RPS contends that the allocation of sites in the SLP is inconsistent with the Spatial Strategy and so is not soundly-based. RPS recommends that further consideration is given to increasing the allocation of land at smaller settlements which are able to accommodate growth to meet local needs in the future, in particular at Meriden.
- 10.4 The approach to housing land supply set out under Policy P5 of the SLP has built in just 2.2% flexibility into the supply in order to meet Solihull Borough's part of the housing requirement (12,912), or just 1.9% against the total housing requirement (15,017). This is despite the SLP's heavy reliance on a relatively small number of very large a strategic site allocations i.e. UK Central Hub Area to meet Solihull's housing needs as well as deliver the contribution towards the housing shortfall across the HMA,
- 10.5 RPS considers that additional contingency measures, in the form of an allowance for flexibility, should be applied to the allocations component included in the land supply provision table in the SLP, in order to cater for currently unforeseen and unknown circumstances and events that result in delays or slowdown in anticipated delivery rates. RPS contends that (as a minimum) an 11% flexibility allowance should be applied to the site allocations required to meet the Borough-wide need of 12,912 dwellings up to 2036, consistent with the flexibility 'margin' previously consulted on. This would equate to an additional allocation of 650 dwellings. By going further to ensure that the housing requirement including the wider HMA contribution is also given the best chance of being delivered, the allowance should be increased by 880 dwellings (representing 11% of the 8,010 dwellings from new site allocations proposed in the SLP).

- 10.6 By increasing the supply of smaller sites that can be brought forward during the early years of the plan period, this negates and makes redundant the use of a stepped trajectory, in line with other local authorities elsewhere i.e Guildford.
- 10.7 RPS also contends that a higher housing requirement figure should be assigned to Meriden (RPS suggests this should be between 187 to 352 new dwellings). This would result in a potential increase in the proportional share of new homes in Meriden ranging from 87 to 252 dwellings. Such an increase would sit comfortably within the scale of overall increase recommended in this submission in order to address the need for greater flexibility in the SLP (of between 650 and 880 dwellings). Furthermore, setting the requirement at this level would also support Meriden's continued role and function as a local service centre providing access to facilities for Meriden residents and those living in the surrounding rural area.
- 10.8 The Council's own evidence suggests that Land off Main Road (reference RP26 in the Green Belt Assessment report) performs less against the Green Belt purposes than the proposed allocation at Meriden (ME1) but has not been considered suitable for allocation. RPS therefore questions the logic of this approach and decision-making behind it.
- 10.9 In terms of site selection, RPS does not accept that the Site performs in sustainability terms in the way suggested by the Council (as set out in the Council's Site Assessment Report) and therefore the report needs to be amended to properly reflect the outcome of the latest iteration of the SA. Consequently, RPS therefore contends that the basis for excluding the Site from inclusion in the SLP as presented in the SAR is flawed, and so is not justified. On this basis, the approach taken to excluding the Site from allocation in the SLP is not soundly-based.
- 10.10 Representations on a number of other policies also highlight concerns regarding the soundness of the SLP, particularly in respect of the proposed scale of growth predicted as part of the UK Central Hub Area proposals (under Policy P1). RPS contends that the predicted level of growth at the NEC is overly-optimistic and is not supported by a clear evidence base, particularly as this will constitute a new housing market within the Borough. Nonetheless, RPS suggests an alternative figure (up to 1,380 dwellings, a reduction of 860 dwellings) based on an annual delivery over the plan period represents a more realistic growth ambition.
- 10.11 As a result of the various recommended changes in the need and delivery assumptions summarised above, RPS contends that additional land should be allocated to accommodate a further 1,740 dwellings within the SLP. This is based on the additional supply:

Additional supply over and above current land provision in the SLP	
Adjustment Factor	Number of dwellings
Flexibility buffer to the requirement	880
Revised housing delivery at UKCH Area (NEC)	860
Total additional supply needed to support delivery of 15,017 dwellings (2020-2036)	

Table 10.1 Proposed flexibility adjustment to support delivery of the SLP

- 10.12 Consequently, the exclusion of Land off Main Road Meriden as a reasonable alternative at Meriden is not justified on the evidence as demonstrated by the many shortcomings with the SLP identified in this submission RPS therefore strongly suggests that there is clear justification for identifying Land off Main Road, Meriden in the SLP. Not only would the proposed allocation of the Site would help to meet the future needs of Meriden but would also assist in addressing the under-supply of land overall across the Borough as identified in the submission (and summarised in Table 10.1). The Site should therefore be allocated in the SLP prior to submission for examination to allow proper debate on its inclusion in the SLP in the context of the overall shortfall in land supply up to 2036.
- 10.13 RPS wishes to participate at all related Examination sessions related to these policies. Should the Council following consideration of these representations believe that modifications to these policies can be made to enable the SLP to be found sound, RPS would be willing to discuss such modifications with the Council.

