

MERIDEN NEIGHBOURHOOD DEVELOPMENT PLAN

Summary of representations received at Regulation 16 stage (Submission)

In accordance with Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendum) Regulations 2012 (as amended), the following table comprises a summary of the representations received to the Submission Draft Meriden Parish Neighbourhood Development Plan.

All of the representations summarised below will be considered by the examiner when preparing his assessment of, and making recommendations on the Meriden Parish Neighbourhood Development Plan.

Representations received to the submission consultation that were submitted to the Independent Examiner		
Respondent	Support/ Object/ Comment	Summary of Representation
National Grid (via Avison Young).	Comment	General The Regulation 16 Consultation Meriden Neighbourhood Plan has been reviewed and National Grid has no comments to make. Further information and contact details supplied in letter should additional advice be needed.
Balsall Parish Council	Support	General Balsall Parish Council both welcome and support the Meriden Parish Neighbourhood Development Plan Submission Draft.
C Conner	Object	Additional Population Objects to additional population in the village: <ul style="list-style-type: none"> - A growing populations will make Meriden less of a 'village' - The existing infrastructure (Schools, doctors, shops, electricity, sewage) cannot accommodate any more growth - The quiet community environment will be lost Traffic The village struggles with traffic. There is a need to protect villagers and school children. Parking is a problem. Additional development will make this worse. Flooding Meriden has problems with flooding. Additional development will make this worse.

<p>Gillings Planning on behalf of Frontier Estates Ltd.</p>	<p>Comment</p>	<p>Policy H1 - Housing Growth Supports the provisions of the SMBC Draft Local Plan re the allocation of land at Birmingham Road (West of Meriden) for approximately 100 dwellings – on the basis that the site would represent a sustainable extension to the village, and where defined housing needs could be met. Whilst the allocation is noted in the Meriden Neighbourhood Plan (shown in figure 5 on page 25) it is not included within the proposed policies. With possible delays to the Local Plan, it is proposed that the allocation is brought forward in the Neighbourhood Plan. Preparatory work and the evidence base already exists for this site through the Local Plan and this would ensure delivery of the proposed allocation and identified housing need provision.</p> <p>Paragraph 2 – Explanation Note and also recognise the need for specialist accommodation for older people in Meriden. (56% of those who responded to the household survey confirmed this as homes to be given priority). Note and support the outcome of the survey whereby 39% of respondents suggested new homes should be built at the Birmingham Road, old caravan/garage site (included in SMBC’s Draft local Plan as Site 10) and that the site was the most highly preferred for housing development by residents.</p> <p>Policy H2 – Local Needs Housing Proposes that the policy should include provision for specialist accommodation for older people given the identified need within the Plan and supporting evidence base. (In the same way that it makes provision for affordable housing on sites within and beyond but reasonably adjacent to the village boundary, where there is a proven and unmet local need).</p> <p>Policy H3 Housing Design Supports general provisions of policy H3. However, should be made clearer to which type of housing developments it will apply. Criterion ‘e’ should be amended to acknowledge that class C2 development has different parking needs to class C3 – such that a ratio of 1 parking space per bedroom would not be appropriate).</p>
<p>Tyler Parkes (on behalf of client).</p>	<p>Comment/ Objection</p>	<p>General Client owns land fronting Birmingham Road, part of Housing Site 10 (West of Meriden), identified for residential development on the Draft Solihull Local Plan Review. Disappointed that no amendments have been made following comments made on the Pre-Submission Draft NDP in October 2019.</p> <p>Policy H1 – Housing Growth and Figure 5 – Village Boundary Objects to Policy H1 ‘Housing Growth’ and Figure 5 – Village Boundary. The designation of the built up area of Meriden is defined in the NDP by the Village Boundary (Figure 5). All areas outside of the village boundary are</p>

		<p>classed as countryside falling within the Green Belt. Client's land is shown in Figure 5 to be outside of the Village Boundary and this does not take account of the proposed allocations in the emerging Solihull Local Plan Review.</p> <p>Policy H1.1 Policy H1.1 should be reworded should include the following : <i>"The Village Boundary shown on Figure 5 will be amended as necessary to accord with any changes to the Green Belt boundary adopted in reviews of the Solihull Local Plan"</i>.</p> <p>Without any amendment to Policy H1 (as above), the NDP would not meet the requirements of the Basic Conditions since it would not be in general conformity with the strategic policies contained in the development plan for the area of the authority.</p>
Historic England	Support	<p>General Supports both the content of the document and the vision and aims set out in it. The Plan is a very good example of community led planning.</p> <p>National Environment/Built Environment Commends the general emphasis of maintenance of local distinctiveness and conservation of landscape character. The extensive evidence base provides a solid platform for the policies and proposals put forward.</p> <p>Policy BE 1.1 Policy could be strengthened by making direct reference to the need to take full account of the Parish Design Guide (or its successors) in any proposed development. Applicants should show how the design guidelines have been addressed and how this has positively influenced the proposed design solution.</p>
Packington Estate Enterprises Ltd.	Comments/Objections	<p>General Plan is generally well written. Comments are made on behalf of the Packington Estate.</p> <p>Page 64 – Plantation Woodlands The second sentence states that: <i>"As part of the ecological enhancement these woodland components should be restored to native broad-leaved woodland by the stage removal of coniferous trees"</i>. This sentence should be removed. The Estate owns Meriden Shafts and Close Wood and the sentence is prescriptive over private woodland.</p> <p>Policy LC1 – Designated Community Assets The Estate disputes the statement that certain areas of land in the list are designated community assets. The land owner of these assets has had no notice to comply with the Assets of Community Value Regulations, and it is understood nor have any of the occupiers listed. The properties that the Estate owns should be removed from the list of community assets: No.2 (Meriden Archery Club and Clubhouse); No.5 (Stonebridge Golf Centre); No.6 (Somers Wood Caravan Park and Somers Road Public Open Space); and No.8 (Meriden Surgery).</p>

		<p>Policy LC2 – Protecting and Enhancing Health Opportunities LC2.2 is not applicable as worded. The surgery is a rented property owned by Packington Estates (Lord Guernsey specifically). The marketing or any use of the property is up to the Landlord. The property is not a designated community asset.</p> <p>Policy LC4 – Designated Local Green Space Objection to designation of land owned by the Estate as local Green Space. Specifically No. 1 – Meriden Archery Club and Grounds. The land is in Green Belt which provides its own protection. Land is not a village green or local authority owned sports field, part is not in Meriden Parish, it is a private club and also a dangerous sport</p> <p>Policy LE4 – Agricultural land and Farm Diversification Agricultural land Classification map is not correctly referenced in paragraph 9.7.1 and the plan is 40 years out of date and inaccurate. Object to Policy LE4.3. New buildings are constantly required for agriculture and Holding change. Policy would be a gross infringement of liberty. Policy should be deleted.</p> <p>Appendix 1 (Public Realm Guidance P14 in the Parish Design Statement) Estate not in favour of narrowing Birmingham Road. Consider the current width reflects the historic context of the road.</p> <p>Maxstoke Lane/ Maxstoke Close Do not support the guidance about future developments at Maxstoke Lane. Development at the north end is practical, subject to suitable traffic measures.</p>
M Antoniou	Comments	<p>General Document is extremely long and it is difficult to pick out the key points/action plan. Agrees with strapline ‘Protecting our History, Planning our Future’. Meriden is a special place to live and the community spirit should be preserved.</p> <p>Housing If additional housing is built, infrastructure and demographic profile of residents should be considered. A number of new builds in the area have been on the market for well over a year.</p> <p>Medical Facilities Agree need to be improved.</p> <p>Shops/Economy Vacant units on the village green. Co-op and Budgens dominate and it would be nice to have independent shops. If there were more pensioners a butcher/baker may thrive.</p> <p>Telecommunications</p>

		<p>Improved broad band and mobile phone signal should be a priority as it is currently dreadful.</p> <p>Transport and Parking Ensure properties have off street parking. Do not add any more restrictions to parking. Bus frequency should be increased and improved to ensure more use it.</p>
Pegasus on behalf of L&Q Estates	Objects	<p>General Representation makes comments on the Meriden Neighbourhood Development Plan (MNDP) and seeks to promote land at Berkswell Road, Meriden, for development to be included within the Plan. There are fundamental issues with the NDP. There are identified but unmet housing needs. It is requested that L&Q Estates be involved in the examination process in order to thoroughly and robustly examine these issues. Comments are made in conjunction with the comments already made by Pegasus Group on behalf of L&Q Estates on the Regulation 14 version of the Plan. Recommended that the Plan period should align with the emerging Solihull Local Plan to a plan end date of 2035.</p> <p>Meriden Housing Needs Survey and Assessment The Survey undertaken in July 2018 (paragraph 3.4.6 of the Plan) is insufficient evidence to provide accurate representation of need. The need identified in the Housing Needs Assessment (March 2019) is not provided for in the NDP.</p> <p>Policy H1 Objects to the justification of the policy as the NDP is not providing for the identified housing need.</p> <p>Policy H2 Settlement of Meriden is enveloped by green belt therefore the identification and allocation of dedicated sites for the provision of housing that are also released from the Green Belt would provide greater certainty that identified housing needs would be met.</p> <p>Policy H3 Design Statement is out of date and needs to be updated. There is no need to replicate national standards for construction methods (c), some stated standards are out of date, objection to proposed level of parking provision (f) as would not promote sustainable transport options.</p> <p>Policy NE1 Evidence should be refined in order to justify the inclusion of the three landscapes as valued. The inclusion of these landscapes may not accord with identified case law.</p> <p>Policy NE2 Overall support. However, Policy is too prescriptive and should be amended to accord with paragraph 170 part d) of the NPPF.</p> <p>Policy NE3</p>

		<p>Overall support. However, policy needs to be better clarified and justified.</p> <p>Policy NE4 Overall support, However policy does not accord with National Environment & Rural Communities Act 2006. Part NE4.2 is not commensurate with National Planning Policy and guidance.</p> <p>Policy NE5 Policy NE5.4 is not justified or evidenced.</p> <p>Policy NE6 Supports overall policy. However, part NE6.4 is not supported as it is not based on any evidence of need or demand or viability.</p> <p>Policy BE3 General intention supported. However, policies BE3.6 and BE3.7 are not commensurate with national policy.</p> <p>Policy LE4 Principle of policy is in accordance with national guidance. However, the practicality of demonstrating that no other land of poorer agricultural quality is available is questionable.</p> <p>Land at Berkswell Road, Meriden L&Q Estates (formerly Gallagher Estates) controls the land at Berkswell Road, Meriden which extends to approx. 1.73 ha. The land is being promoted for residential development of up to 50 homes. The site is within reference 197 of SMBC's 'Call for Sites' schedule, as assessed within the Council's 2016 SHELAA. The wider parcel of land the title of 'site 197 Land South of Strawberry Fields' within the NDP. Site description, proposal and promotional vision document is provided within the representation. Development of site would meet the demonstrated local housing need and contribute to the wider prevailing housing need, subject to release from the Green Belt.</p>
The Coal Authority	No Comments	Neighbourhood Plan lies within the current defined deep coalfield. However since the neighbourhood Plan area does not contain any surface coal resources or risks from past coal mining activity at shallow depth, Coal Authority has no specific comments to make.
Savills on behalf of J H Barber and Son	Objects	<p>General Request that the MNDP should be reviewed. Request that the Examiner is provided with the full representation submitted and that the Examiner agrees to hold a hearing for the purpose of receiving oral representations. Request for transparency regarding the funding referred to in paragraph 1.2.2 of the MNDP.</p> <p>Site at Main Road, Meriden JH Barber and Son own Berryfield Farm at Meriden which includes The Barn at Berryfields Restaurant and the Butchery/Deli and land south of Main Road, Meriden.</p>

		<p>Representations have been made to the Local Plan review and a submission made under the ‘call for sites’ process. It is not mentioned in the MNDP if submissions of sites to the Local Plan have been considered in preparation of the MNDP.</p> <p>Details of site located on the south eastern side of Meriden, south of Main Road and east of Berkswell Road is contained within the submission. Site is approx. 7.8 hectares and has potential for circa. 200 dwellings.</p> <p>Basic Conditions Concern that aspects of the MNDP do not meet the ‘basic conditions’ as set out in paragraph 8 of schedule 4B to the Town and County Planning Act 1990 (as amended).</p> <p>National Planning Policy Framework Concern that the MNDP is contrary to policy contained with the NPPF and should therefore cause the process to be paused.</p> <p>Policy H1 Conflicts with national policy and should be deleted. Proposed locations for growth should be considered in a strategic context. If policy H1 remains figure 5 should be amended.</p> <p>Policy H3 Object to policy regarding overprovision of allocated car parking spaces for 4 and 5 bedroom dwellings. Also the requirement re Lifetime Homes Standard since this is unjustified.</p> <p>Policy NE1 Objection to new valued landscape designations. No requirement to replicate NPPF.</p> <p>Policy NE3 Object to part (h) and (i) since they are overly restrictive and not justified.</p> <p>Policy NE5 NE5.1 should be deleted as it replicates national policy and is not clear. NE5.4 is not justified and NE5.7 is not necessary as it will be addressed through building regulations.</p> <p>Policy NE6 Object to NE6.4 since this has the potential to impact on viability and no evidence is given to support policy.</p> <p>Policy BE4 No objection in principle but it would be advisable to identify the particular routes to assist the delivery of the policy.</p> <p>Policy LE4 Request omission of LE4.1.</p> <p>Monitoring and Review Request clearer indication of measurable triggers for a review (paragraphs 1.5.2 and 1.5.3).</p>
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Sport England	Comments	<p>Policy LC1 (Designated Community Assets) and Policy LC4.1 (Local Green Space Designation) There is overlap of the policies with both policies including protection for named playing field and sporting activity sites. Policies (or a separate policy) should reflect requirements of NPPF paragraph 97 (a) and also contain a provision to enable the enhancement of sporting provision(s) at the sites, particularly where supported by strategic evidence based documents. This will ensure conformity with NPPF paragraph 96 and 97.</p>
Stansgate Planning on behalf of IM Land	Objects/Comments	<p>General Stansgate Planning act in respect of IM Land in respect of representations to the MNDP. IM Land are promoting land north of Main Road, Meriden for development of up to 100 high quality homes with approx. 6 hectares for green infrastructure. This land has been promoted at each stage of the Local Plan Review. The representation includes details of the site and vision documents for the proposal.</p> <p>Conformity with the Adopted Local Plan The MNDP is confused as to the strategic policy it must conform to – i.e. the Solihull Local Plan (2013) or the Local Plan Review. The housing allocation at site 10 (West of Meriden) is part of the Local Plan Review and therefore not a forgone conclusion. The MNDP should give no reliance to the proposed allocation site 10 West of Meriden.</p> <p>Neighbourhood Plan and Site 10 West of Meriden The MNDP can make its own housing allocations and does not need to reply on the emerging LPR. The straw poll of sites (paragraph 3.4.3) is not objective or now relevant as the context has changed. Paragraphs 4.2.4-4.2.7 are confused as it mixes the evidence base of the adopted local plan and the emerging local plan. Section 5 Strategic Objection 1 should be rewritten.</p> <p>Housing Need Section 5 Housing should have some clarity on housing need. Paragraph 5.3 is misleading and should be removed. The AECOM Housing Needs Assessment 2019 is misreported. It should be reported accurately and the MNDP should recognise that it cannot plan for housing need beyond 2028 as this will require changes to the Green Belt.</p> <p>Policy NE1 – Valued Landscapes Policy is confused and has two fundamental errors: the confusion between what constitutes a landscape and what constitutes a view; and the definition of a ‘valued landscape’ in planning policy. Policy should be removed as it</p>

		does not satisfy the Basic Conditions. Landscape consultants Barton Willmore provide detailed advice in a separate report provided with the representation.
Solihull Metropolitan Borough Council	Comments	<p>General The Council is generally supportive of and welcomes many of the aims and objectives of the Plan. The content is generally consistent with national and local planning policies and addresses topic areas appropriate to the Meriden Parish area. A significant amount of work has gone into drafting the plan and this is to be commended. However, it is recommended that the following points are given consideration.</p> <p>Vision and Strategic Objectives The Vision and Strategic Objectives set out in the Plan are to be welcomed and supported.</p> <p>Housing Much of the content is welcomed as consistent with national and local planning policies. Based on engagement with the local community, the Plan provides more detailed guidance appropriate to a NDP. However, there are some areas that are considered to need further revisions.</p> <p>Site Allocation It is welcomed that the NDP provides support for the proposed site allocation ‘West of Meriden’ included in the current Local Plan Review.</p> <p>Policy P2 sets out policies with regard to Local Needs Housing and refers to the latest Housing Needs Survey. The policy should be amended to include reference to the need for viability and feasibility testing. The testing will be required to ensure that any proposals and/ or requirement for bungalows (as contained within the Housing Needs Survey) is viable and feasible given the impact on density, housing mix and efficient use of land. The table at paragraph 5.3.1 should explain that the number of homes is between 2011 and (presumably) 2018, as there may have been further completions since then.</p> <p>Policy H3 requires all new housing developments to ‘have regard to Meriden’s Parish Design Statement’. However, since the Design Statement is dated 2011, it pre-dates the original National Planning Policy Framework (NPPF) in 2012 and subsequent revisions and the adopted Local Plan (2013). Design guidance within the NPPF and Local Plan will therefore take precedence where there are areas of conflict and it is considered the policy/explanation should make this clearer.</p> <p>It is unclear if the Design Statement is being updated. Policy H3 needs to be clearer if it is referring to the adopted Design Statement (2011) and/ or subsequent revisions.</p> <p>Policy H3.1(e) refers to the avoidance of development ‘to the rear of existing properties which would adversely affect them’. This should be reworded to ensure such developments can be considered on a case-by-case basis.</p>

		<p>Whilst the Plan may wish to discourage such developments, it should not rule out developments that, with effective and appropriate design, could enhance the local area, meeting local identified needs.</p> <p>Policy H3.1(f) sets out parking requirements for residential development. However, it is considered to be excessive, particularly for larger dwellings (i.e. 4+ bed dwellings). It is contrary to the Council’s evidence based approach and may be in conflict with the National Planning Policy Framework (NPPF). A similar policy to that recommended by the Examiner for the Balsall Parish Neighbourhood Plan should be used in a re-worded Policy H3.1(f): <i>“Development proposals must have appropriate regard for the higher levels of car ownership evident within the Meriden Parish Neighbourhood Area. Whilst suitable parking provision must be integral to the design of schemes, the number of off-street parking spaces for residents, employees and visitors should be justified and provided on the basis of an evidenced assessment of:</i></p> <ul style="list-style-type: none"> <i>a) the accessibility of the development;</i> <i>b) the type, mix and use of development;</i> <i>c) the availability of and opportunities for public transport;</i> <i>d) local car ownership levels; and</i> <i>e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”</i> <p>Natural Environment</p> <p>In general, this is a very comprehensive and well organised chapter with informative information regarding valued landscapes, biodiversity and habitats.</p> <p>A baseline ecological survey has been completed and submitted with the Plan (Appendix 9). This is valuable information which gives context to the narrative within the Plan and will help when trying to apply the policies for future developments. Policies regarding flooding and drainage are encouraged and supported.</p> <p>Policy NE6.4 – Positive intentions are welcomed. However, it may not be always be feasible or perhaps viable that ‘all new dwellings must have at least one charging point for electric vehicles’ as this will depend on the allocated parking. Wording of the policy should be amended to reflect this. There is currently no policy on this in the adopted Local Plan but this is being reviewed as part of the current Local Plan review.</p> <p>It should be noted that the designation of ‘Quiet Lanes’ as set out in the Guidance under paragraph 6.13.2, may be difficult to deliver. If businesses on these roads object it may prevent the Quiet Lane being designated. The Parish Council are aware of this and it may be helpful to update the paragraph to reflect this.</p> <p>Built Environment</p> <p>Policies are considered to be in conformity with the adopted Local Plan and are supported.</p> <p>Paragraph 7.3 should be amended as the Council considers that narrowing of the carriageway of Main Road would now be unacceptable as Main Road is a bus route with a designated cycle lane and there are also a number</p>
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		<p>of right-turn lanes along Main Road and ‘narrowing’ of the carriageway may adversely affect these. It is therefore suggested that proposals for the improvements to Main Road should allow for a bespoke scheme to be designed. The text could be amended, for example to: ‘investment in improvements to the design to the Main Road carriageway area to ensure it enhances the character, appearance and functionality of the village’.</p> <p>Paragraph 7.4.3 sets out the ‘character areas’ of the village and parish which are discussed in more detail in the Design Statement (Appendix 1 of the Plan). However, since the Design Statement was written in 2011 it does not include more recent developments – for example the development at Leys Lane. It would be appropriate to add a note within the text to this effect.</p> <p>Local Community</p> <p>These policies support and expand upon those within the adopted local plan and are to be supported. Policy LC4 designates 17 areas as Local Green Space. However, Spaces 2 (‘Coronation Island and the Wildlife bank behind it’) and 7 (‘Memorial Approach’) are within adopted highway land and the land may need to be retained for possible future improvements. In order to resolve this, a clause has been added at paragraph 8.7.4 stating that where a Local Green Space is on adopted highway land, there may be operational reasons why maintenance and improvements affecting the Local Green Space are necessary.</p> <p>Local Economy</p> <p>This chapter aims to contribute to building a strong, responsive and competitive economy by ensuring sufficient land and premises is available, protected and supported, including the provision of infrastructure. The policies are in conformity with local and national planning policies.</p> <p>Traffic, Transport and Road Safety</p> <p>This chapter seeks to set out the issues and priorities for on-going improvements to transport and parking within the Parish. It also includes a list of community aspirations priorities that developer contributions and any Community Infrastructure Levy (CIL) payments could be used for.</p> <p>Planning Practice Guidance for Neighbourhood Planning states: “Wider community aspirations than those relating to development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan. (Paragraph: 004 Reference ID: 41-004-20170728). The Projects within the chapter are intended to form the basis for on-going dialogue between Meriden Parish Council, Solihull Council and other key stakeholders. The text within the chapter should make this clear. In particular, the wording of Project 1.1 should be amended to highlight that the proposals are subject to consultation with SMBC and wider stakeholders.</p>
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