

## Meriden Neighbourhood Development Plan Independent Examination – Examiner Letter Seeking Clarification of Matters

### Joint Response from Meriden Parish Council and Solihull Metropolitan Borough Council

This response to the Examiner's letter dated 18 December 2020 brings together the response from both Meriden Parish Council and Solihull Metropolitan Borough Council. The response from Meriden Parish Council is shown in red text and the response from Solihull Metropolitan Borough Council in blue text, with the overall response agreed by both parties.

1. Meriden Parish NDP Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report November 2019 (SEA and HRA Screening Report), section 4, paragraphs 4.2.1 to 4.2.10. This references the screening exercise undertaken by Warwickshire Wildlife Trust in 2008 and the further screening undertaken by Middlemarch Environmental Ltd in 2012 and 2013, which concluded that no significant effects were considered likely on Natura 2000 (European) sites from policies or proposals in the Solihull Local Plan 2013 or the Gypsy and Traveller Site Allocations Plan 2014, and confirms that the screening reports were approved by Natural England.
2. The 2013 Solihull Local Plan was subject to a High Court challenge soon after it was adopted. The [High Court Order](#) of May 2014 deleted the parts of the Plan relating to the housing land requirement and housing trajectory, and this was upheld by the Court of Appeal in December 2014. As a result, although Policy P5 'Land for Housing' is a strategic policy, it does not include a housing requirement, and therefore there is not a specified housing figure for the Borough or the constituent Neighbourhood Areas. Further information can be found on the Council's website here: <https://www.solihull.gov.uk/Planning-and-building-control/Solihull-local-plan>
3. Due to the High Court Order, the 2013 Local Plan (that runs from 2011-2028) does not set out a housing requirement, either for the Borough or for any sub-areas. The Council has used the standard methodology for Local Housing Need since its introduction in February 2019. AECOM have referred to a housing target, but in effect, it does not exist in the Local Plan, so they have taken a proxy from the housing land available as of adoption of the 2013 Plan.
4. Neighbourhood Plans are not under the same obligations as Local Plans in respect of the assessment of housing need and the provision of housing to meet that need. In fact, many Neighbourhood Plans make no provision whatsoever for new housing allocations. This is principally a matter for the host planning authority and only for the Qualifying Body if it chooses. Due to the Green Belt constraint around the village, it was not felt appropriate for the Qualifying Body to allocate land for new housing allocations which would likely be in conflict with national and local planning policy on Green Belts. Consequently the Qualifying Body has no specific evidence that sets out the assessment of the housing requirement for the Neighbourhood Area for the remainder of the Neighbourhood Plan period up to 2033. The post-2028 housing evidence may be based on the 2016 Local Plan Review (supported by the Peter Brett Associates Strategic Housing Market Assessment published in 2016), or the 2019 Supplementary Consultation to the Local Plan Review (based on the standard methodology for

Local Housing Need and making allowance for a 2000 contribution to the wider Housing Market Area).

5. The Qualifying Body understands the term 'now' to mean at the time of writing the Housing Needs Assessment report. For some reason, the assessment appears to have looked at the period up to 2028 whereas the plan period for the Neighbourhood Plan extends to 2033 to coincide with the Local Plan review timeframe. The implications of excluding the period 2029-33 is that the affordable housing requirement is likely to be slightly higher than the figure of 86. SMBC can provide the latest figures on completions and pipeline.
6. Of the figures in paragraph 5.3.1 of the Neighbourhood Plan, one application is not on the SMBC system with that reference (Grand View, Birmingham Road), one application is for 1 unit not 2 (Berryfields Farm), one application has net zero dwellings (Five Oaks), and two applications are not within Meriden Parish (Shirley Lane; and Back Lane). The resultant figures from the table is that 168 dwellings have been permissioned, and 160 of those have been built out between April 2011 and March 2020. Further detailed information is provided in a spreadsheet.
7. The Village Boundary outlined in Figure 5 in the NDP follows the existing inset village boundary in the Solihull Local Plan 2013 excluding the draft SMBC housing allocation off Birmingham Road on the western fringe of the village (see separate map, with the Draft Local Plan proposal shown hatched in red). The Village Boundary incorporates the built-up area of Meriden and broadly follows the Green Belt Inset Area boundary as shown on the Proposals Map for the Solihull Local Plan/ Gypsy and Traveller Site Allocations Plan 2014. However, the area south of Mons Avenue/St Laurence Close is excluded as it is not built-up, although it is within the Local Plan Inset Area, whilst the outbuildings to the rear of 118 Fillongley Road are included in the Village Boundary, although in the Green Belt.
8. The area designated as 'inset' in the Green Belt is not all within the designated Village Boundary. Proposed LGS12 and 13 are not within the Green Belt because they are within the 'inset' boundary. However, neither of these proposed LGS's are within the existing or proposed Village Boundary. Whittle's Copse and Green off Strawberry Fields are adjacent to the Strawberry Fields development, whereas Mulberry Gardens Public Open Space and Leys Lane Allotments are respectively a much larger local green space and a separate use not associated with any development and together a significant area that is not built-up.
9. With the exception of the two areas comprising LGS12 and LGS13, this statement is correct. The Qualifying Body would be happy to include this rider in revised wording for the policy. The two areas set out in 7. above are not consistent with the Green Belt Inset Area boundary. Either the Village Boundary should be altered to conform with the Inset Area boundary, or Policy H1.2 should be amended to recognise that the boundaries are not the same.
10. The Qualifying Body would be happy to specifically refer to 'Enabling Development' in addition to the exceptions already included in the policy but this is effectively covered by the exception 'conversion of existing buildings to dwellings'. Additionally, the Qualifying Body would be happy to include the subdivision of existing residential properties in the list of exceptions. Policy H1.3 does not provide any local guidance additional to NPPF paragraph 79 b) c) and d), although b) is covered in Policy BE3.5. NB. Policy H1.3 also covers some of the exceptions to inappropriate development in the Green Belt in NPPF paragraph 145.

11. The Qualifying Body is happy for the title of policy LC1 to be changed to 'Community Assets'. The term used in the Assets of Community Value (England) Regulations 2012 is listed and it is recognised that this would be more appropriate than the word designated used in the heading to Policy LC1 and clause LC1.1.
12. It is confirmed that part of the Meriden Archery Club and Clubhouse and at least part of the Stonebridge Golf Centre and Somers Wood Caravan Park are within the Meriden Parish Neighbourhood Area.