



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

Name of the Local Plan to which this representation relates:

Regulation 19

Please return to psp@solihull.gov.uk or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14th December 23:59

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This form has two parts –

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

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Michael"/>
Last Name	<input type="text"/>	<input type="text" value="Robson"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Lavender Hall Fisheries Ltd
c/o agent"/>	<input type="text" value="Cerde Planning Ltd"/>
Address Line 1	<input type="text"/>	<input type="text" value="5-7 High Street"/>
Line 2	<input type="text"/>	<input type="text" value="Sutton Coldfield"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="B72 1XH"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="[REDACTED]"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

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

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The purpose of this policy is to safeguard the best and most versatile agricultural land in the Borough, and to identify land designated as Green Belt which is to be kept permanently open in accordance with national Green Belt policy.

So far as Green Belt provisions, paragraph 136 of the NPPF makes clear that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and justified through the preparation or updating of plans. Thus, the Local Plan Review is the correct process for re-considering Green Belt boundaries.

We consider that the Council have explored in detail the changes to Green Belt boundaries in the context of removing land for the purposes of positive allocation (most notably for housing), however the Council have not given due consideration to revisiting Green Belt boundaries where land no longer fulfils a Green Belt function.

One such example is at Lavender Hall Fisheries, Berkswell, where HS2 will separate this land parcel from the wider Green Belt and where the adjacent land is proposed as a residential allocation (site BC6) for 80 houses. In relation to the adjacent, draft allocation land the emerging Local Plan makes clear that although this site was seen to be high performing in the Green Belt Assessment 2016, the proposed HS2 route provides a new feature to separate the wider Green Belt from the site and settlement area of Balsall Common.

We include a plan of this land to demonstrate the submission that is being made.

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

The Council should give much greater consideration to Green Belt boundaries and whether these should be redrawn, not solely in relation to the provision of positive allocations of land but instead to reflect the change in circumstances which justifies a review as to the extent land fulfils a Green Belt function. Lavender Hall Fisheries, Berkswell is one such example whereby the lack of any change to Green Belt boundaries undermines the permanence of Green Belt and the robustness of policy seeking to maintain openness.

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

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

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

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

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

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

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

We raise serious issues which go to the heart of soundness. We consider that our submissions are best reviewed orally, along with other participants who will no doubt be making similar representations, to best assist the Inspector(s) in coming to a view as to whether the Local Plan Review should proceed to adoption, modified or not.

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

9. Signature:

M Robson

Date:

14.12.20