



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

Name of the Local Plan to which this representation relates:

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" value="Mr"/>	<input type="text" value="Mrs"/>
First Name	<input type="text" value="Stephen"/>	<input type="text" value="Lois"/>
Last Name	<input type="text" value="Dunn"/>	<input type="text" value="Partridge"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="Sworders"/>
Address Line 1	<input type="text" value="C/o Sworders"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
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 checked="" 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 checked="" 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.

Paragraph 65 of the Plan states that:

'The strategy ... seeks to focus significant developments in locations that are, or can be, made accessible. These locations will typically be on the edge of the urban areas or within the rural settlements that have a greater range of services.'

As set out in paragraphs 675 to 687, Knowle has a wide variety of shops, services and community facilities, and is well served by public transport and community facilities. Site selection growth option G provides for significant expansion of rural villages/settlements, of which Knowle is one.

The delivery of the two large sites (one for 180 dwellings, one for 600 dwellings) at Knowle could be delayed due to the need to deliver infrastructure to support the scale of the proposed development. Issues such as the relocation of the Football Club could delay delivery.

We contend that by allocating only two sites in Knowle, the spatial strategy is unsound because it does not inherently have any flexibility to ensure the continued delivery of new homes in Knowle, if the delivery of either or both of the allocated sites is delayed. The strategy should allocate further, smaller sites around Knowle,

such as Land at Kenilworth Road; this site could be delivered in a much shorter timeframe, it has no significant constraints, and it could come forward without the need for significant infrastructure provision. The site covers an area of 3.8 hectares; a plan is appended for ease of reference.

(Continue on a separate sheet /expand box if necessary)

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.

In order to make the Plan sound, the spatial strategy should be amended to allocate more sites for development around Knowle, to increase the flexibility of the spatial strategy, to ensure that the strategy delivers a steady supply of housing.

(Continue on a separate sheet /expand box if necessary)

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:

N/A

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:



Date:

07/12/20

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

419

Policy

P17

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

x

No

4.(2) Sound

Yes

No

x

4 (3) Complies with the
Duty to co-operate

Yes

x

No

Please tick as appropriate

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

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Para 419 refers to the Green Belt Assessment which was undertaken. In that assessment, Land at Kenilworth Road was assessed as part of Land Parcel RP38, which lies to the south east of Knowle. This is a large parcel of land which extends east to the Grand Union Canal, and as far south as the A4141 Warwick Road. Our client's site, Land at Kenilworth Road, forms the very northern part of this parcel. It lies immediately adjacent to existing residential development along Kenilworth Road in Knowle.

The land parcel as a whole scores highly against the Green Belt purposes, but we contend that the assessment is not sufficiently detailed, and therefore does not account for differences within the parcel. For example, the parcel performs highly against the purpose of the Green Belt which prevents neighbouring towns from merging into one another. However, Land at Kenilworth Road, which only covers an area of 3.8 ha, does not extend into open countryside any further than the existing built form of Knowle to the east and therefore does not make a significant contribution to this purpose of the Green Belt.

The Plan relies on the findings of the Green Belt Assessment to inform the Council's decision on which areas of land perform less well against the purposes of the Green Belt, and which can be released from Green Belt and allocated for development.

As such, the Plan is not sound because it relies on an assessment of large areas of land, which provides a very blunt analysis. If assessed in smaller parcels and more detail, smaller parcels land would be able to be released from the Green Belt and allocated for development. As such, as in this case of land at Kenilworth Road, the most sustainable sites are not being released for development.

(Continue on a separate sheet /expand box if necessary)

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Further work should be done on the Green Belt assessment to assess smaller parcels of land adjacent to sustainable settlements, to enable land to be released from the Green Belt which does not perform highly against the purposes of the designation.

(Continue on a separate sheet /expand box if necessary)

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.

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

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

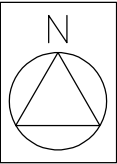
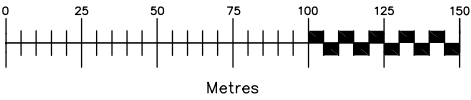
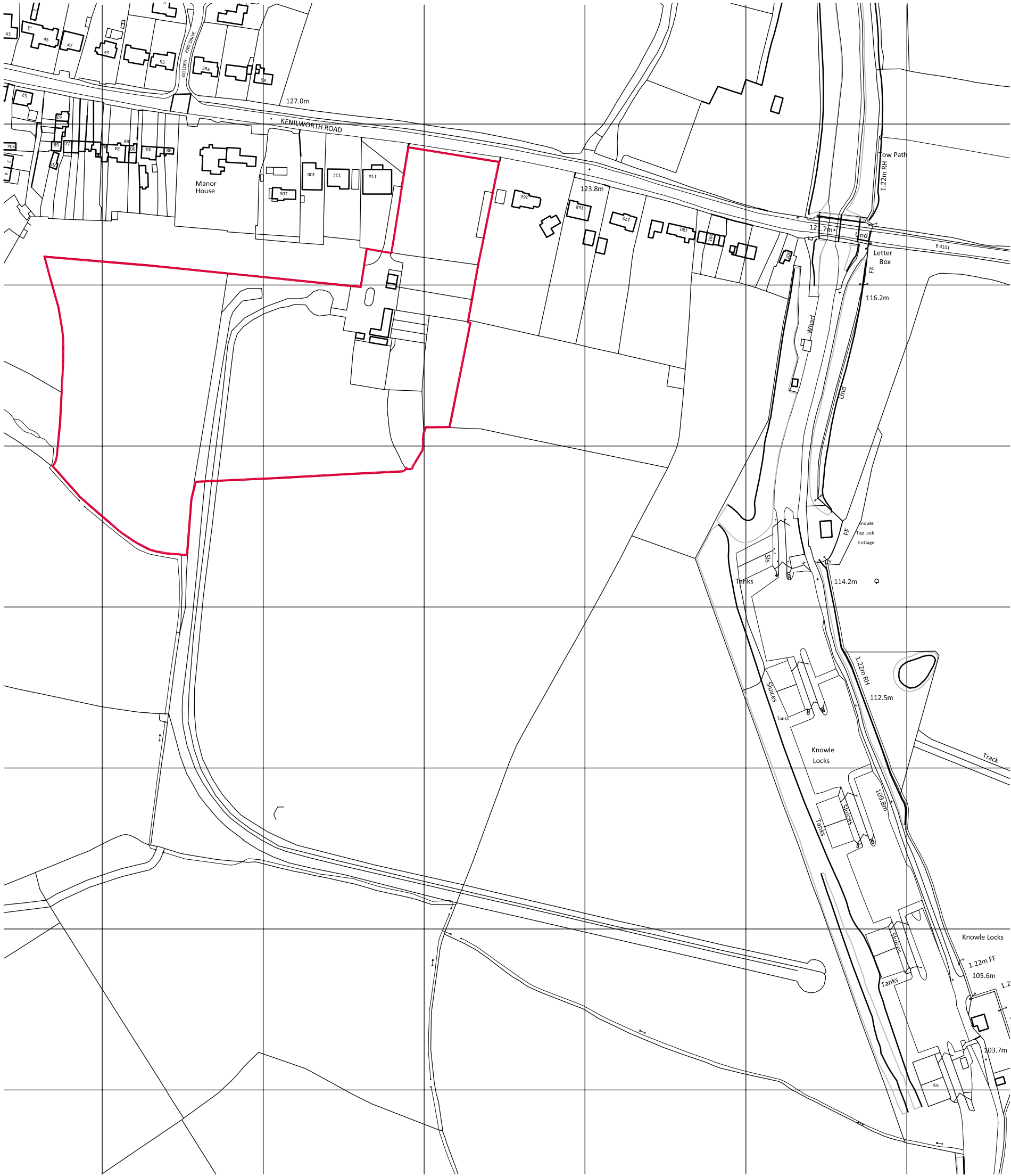
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified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

9. Signature:

Date:

08/12/20



Notes:



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B	08/12/20	REDLINE AMENDMENT
/	06/03/19	FIRST ISSUE
REVISION	DATE	AMENDMENT

SCHEME:

LAND AT KNOWLE
SOLIHULL

TITLE:

RED LINE PLAN

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