



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

Name of the Local Plan to which this representation relates:

Solihull Draft Submission Plan

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

Mr

First Name

Joseph

Last Name

Cramphorn

Job Title
(where relevant)

Senior Planner

Organisation

Savills UK

(where relevant)

Address Line 1

55 Colmore Row

Line 2

Line 3

Line 4

Birmingham

Post Code

B3 2AA

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: Hampton Road Developments

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.

Officially, the Government state that the HS2 Interchange station will be completed by 2026. This is however unlikely to happen. Paragraph 280 of the draft plan states that the HS2 line is expected to open between 2029 – 33. Paragraph 89 of the plan refers to 2,740 homes being delivered up to 2036. If the plan is adopted in early 2022, with two years lead in for planning and a year for site works, development may not begin until 2025. This allows for eleven years to develop out the 2,740 units. If this was spread out over eleven years equally, this would equate to 249 dwellings per annum. This is a very high level of delivery that we do not consider has been adequately demonstrated as being deliverable, considering delays in delivery of the HS2 Station.

It should be noted that in 2018, the Hub Framework stated up to 550 homes as being delivered at the NEC up to 2022. We have reviewed Solihull's online application register and cannot see reference to an application for residential development at the NEC. We therefore consider that the levels of delivery envisaged, even in the early stages of the plan period are overambitious. We therefore consider that this policy is not effective in the way that it is currently drafted.

(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.

We have requested further information from the Council in relation to the planned trajectory and stages of delivery of these housing numbers. We understand that such details are not currently available. It is not clear how much residential development will be delivered around the area safeguarded for HS2 and the Interchange station and whether delivery will be effected by the safeguarding and or construction priorities. To confirm deliverability of the 500 dwellings, we consider that further information in relation the planned delivery of the site is provided to confirm that the delivery of the HS2 station does not prejudice the delivery of the 2,740 homes to be delivered up to 2036. We request further evidence from the Council to ensure that conclusions regarding housing delivery are effective to deliver a sound plan.

The proposals for circa 20% of the housing target in a single location should be reviewed as they are not considered to be sound, deliverable or provide an effective or justified strategy.

(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:

To provide oral evidence and engage in the Examination discussions on this matter.

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:

[Redacted Signature]

Date:

14/12/20