



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*		2. Agent's Details (if applicable)
<i>*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.</i>		
Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Joseph
Last Name	<input type="text"/>	Cramphorn
Job Title (where relevant)	<input type="text"/>	Senior Planner
Organisation (where relevant)	Hampton Road Developments Ltd.	Savills UK
Address Line 1	c/o Agent	55 Colmore Row
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	Birmingham
Post Code	<input type="text"/>	B3 2AA
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>

(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.

It is noted at criterion 4 of policy P21 that the plan has been subject to a Viability Assessment to ensure the policies are deliverable. Savills has undertaken an initial review of the conclusions drawn by the viability report in relation to Site KN1 – Hampton Road, Knowle.

We highlight the following issues with the viability assessment produced:

- The site is assessed at 300 dwellings, yet is now a draft allocation for 180 dwellings. The site should no longer be considered as a “large site” and thus the section 106 contributions should therefore be assessed differently.
- The likely Open Market Value should be estimated differently. Further evidence is requested as to the choice of a 15% reduction taken forward in the report.
- Contingency should be increased to 5%, which is the market norm.
- The report produced by C&W does not include the specific viability assessments conducted to assess CIL headroom. As a result, requirements set out by the NPPF and PPG for viability assessments to be “proportionate, simple, transparent and publicly available” has not been adhered to and therefore conclusive advice on the impact to viability of unreliable assumptions cannot be accurately conveyed

We request that the viability assessment is re-run taking account of these concerns in respect of site KN1. The Council should seek to respond to this critique either with robust evidence or make the changes proposed within their assessment. We reserve the right to submit further

information in support of this position as may be requested by the Inspector as the examination progresses.

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 seek to amend the draft viability report to take account of the concerns raised by Savills.

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