



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*		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"/>	<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="Kler Group Ltd c/o agent"/>	<input type="text" value="Cerde Planning"/>
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.

As promoters of approximately half of site KN2, we support the principle of the site being removed from the Green Belt and put forward as a positive allocation of land for housing.

We do however raise a number of detailed issues in relation to detailed matters in respect of the draft allocation.

The Concept Master Plan, referenced at Criteria 2 to the policy, continues to evolve and remains an iterative draft with further evolution anticipated before the Local Plan Review is examined. Important landscape features continue to be identified, and the setting of heritage assets is not as yet fixed. This should be clarified as being for indicative purposes and that a final masterplan will be formulated as part of the development management process.

The provision of open space and how and where this could be located for example in relation to the Local Wildlife Site is to be explored further.

So far as Criteria 3, infrastructure requirements should also refer to the provision of 40% affordable housing in accordance with Policy P4A.

So far as Criteria 4, the extent of Green Belt enhancements will need to be considered once further work is concluded in relation to the Concept Master Plan and the position is settled upon in terms of on-site mitigatory measures.

The provisions of Criteria 5 are noted vis a vis the Concept Master Plan being the possible subject of change in light of further work that may need to be carried out; this is work that continues to be carried out in the context of the Local Plan Review as well as potentially additional work in the context of a future planning application.

In relation to the Arden Academy and the provision of a through school, we have raised a series of concerns over an extensive period as to the extent to which evidence supports the re-provision of the Arden Academy and whether this is a necessary infrastructure requirement arising from the draft allocation. We have invited the Council to clarify their position in relation to these matters, most recently by email dated 8th December 2020 appended to these Representations. Once the Council have responded, we can continue to discuss the form of the draft allocation which we anticipate being able to conclude in readiness for the examination hearing sessions.

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.

See comments above – modifications to be discussed as draft allocation progresses.

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:



Date:

14.12.20