



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"/> | <input type="text" value="Mr"/> |
| First Name | <input type="text"/> | <input type="text" value="Michael"/> |
| Last Name | <input type="text"/> | <input type="text" value="Davies"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text" value="Director"/> |
| Organisation (where relevant) | <input type="text" value="Bloor Homes"/> | <input type="text" value="Savills UK"/> |
| Address Line 1 | <input type="text" value="c/o Agent"/> | <input type="text" value="REDACTED"/> |
| Line 2 | <input type="text"/> | <input type="text"/> |
| Line 3 | <input type="text"/> | <input type="text"/> |
| 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 | <input type="text"/> | <input type="text" value="REDACTED"/> |

(where relevant)

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.

References contained at point 5 of the policy clearly indicate that there is a significant question mark over its deliverability. The policy states “Until such time as these facilities [existing sports facilities south of Tythe Barn Lane] are appropriately relocated or robust plans have been confirmed to secure a timely relocation that would prevent the closure of any associated clubs....development of the site will not be supported”. Until the relocation of the sports pitches that enable the deliverability to take place on site BL1 (land West of Dickens Heath) it cannot be justified in policy terms. There are significant delays associated with resolving this issue; firstly suitable alternative locations have to be found for the pitches to be relocated to; and secondly, those sports pitches have to be laid out and often that takes a 2 to 3 year time span to set them up because of the need for specialist grass and proper drainage and sub soil preparation for that grass to be laid.

Paragraph 16 of the National Planning Policy Framework (‘NPPF’), requires plans to “*be prepared positively, in a way that is aspirational but deliverable*”. Savills emphasis This reference provides a very real risk to the deliverability of this allocation and something we consider the Council should not be leaving to aspiration or fortune. The proposed allocation of the 350 homes is being put at jeopardy where alternative locations cannot be found for the existing sports pitches and on this basis the site should only be safeguarded at this stage and an alternative site such as site 192 (land east of Tilehouse Lane, Tidbury Green) be included in the plan as this site is not the subject of these deliverability concerns and performs lower in Green Belt terms than BL1.

(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 consider that there are several options the Council have to make this allocation sound. Firstly they should confirm the latest position on the progress made on the relocation of the sports pitches required to make BL1 deliverable. As written BL1 is not justified or effective as the text (bullet 5) is clear that until these facilities are relocated or robust plans the relocation has not been confirmed "development of this site will not be supported". This is not positive planning and puts much needed housing delivery at risk. Secondly the Council could consider whether a larger area of land around Tidbury Green such as land east of Tilehouse Green land could be considered as part of the comprehensive strategy to deliver the housing as it does not require the relocation of sports pitches. This could mean that some or all of the sports pitches remain in situ. Until the position regarding the sports pitches is made clear then either the allocation should be downgraded to safeguarded land or an alternative allocation is provided that is deliverable site such as the site to the south (site 192) - land east of Tilehouse Lane, Tidbury Green.

In Green Belt terms site 192 scores 6 which is less (i.e. lower performing in Green Belt terms) than the proposed allocation BL1 (score of 7). In landscape sensitivity terms site 192 scores the same (as they are in the same sub area - LCA2) as BL1.

In allocating site 192 and safeguarding site BL1, we consider the plan would be more effective and sound. This representation should be read in conjunction with representations made to policies P1 and P5 which are fundamental to the Borough's housing strategy.

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:

Savills on behalf of Bloor Homes

Date:

14/12/20