



**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](mailto:psp@solihull.gov.uk) or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> 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="██████████"/>
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="██████████"/>
██████████	<input type="text"/>	<input type="text" value="██████"/>
██████████████████	<input type="text"/>	<input type="text" value="██████████"/>
E-mail Address	<input type="text"/>	<input type="text" value="██████████████████"/>

(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.

Officially, the Government state that the HS2 Interchange station will be completed by 2026. Given delays that often happen on large infrastructure project, we consider that this timescale is likely to be pushed back. 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 that delivery of 2,240 homes during the plan period would include up to 550 homes 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. Furthermore, we understand that UK Hub requires a new connector road from the Coventry Road to a new motorway junction on the M42, being a "just in time" for JLR and its Damson Parkway units. Whilst it has received in-principle go-ahead, the land has to be purchased and the road has to be built which could involve a significant delay.

We have requested further information form the Council in relation to the planned trajectory and stages of delivery of these housing numbers. We understand that such details are not available. We are therefore also not aware of how much of this housing delivery the Council considers will be required to be delivered before the HS2 station is completed.

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 therefore request further information in relation the planned delivery of the site and reas-  
surance that the delivery of the HS2 station does not prejudice the delivery of the 2,740  
homes to be delivered up to 2036. Notwithstanding we challenge the assumed delivery rate  
proposed by the Council in this location and the provision of circa 20% of the overall dwelling  
provision in a single location in a high density format which does not accord with the Bor-  
ough's housing requirement for predominantly family housing.

We request confirmation from the Council of the amount of housing and related infrastructure  
that will be coming forward for completion before this date. A whole community is needed to  
be formed from scratch. Although this is not beyond the realms of possibility, 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.

**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