



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

Name of the Local Plan to which this representation relates:

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.*

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address
(where relevant)

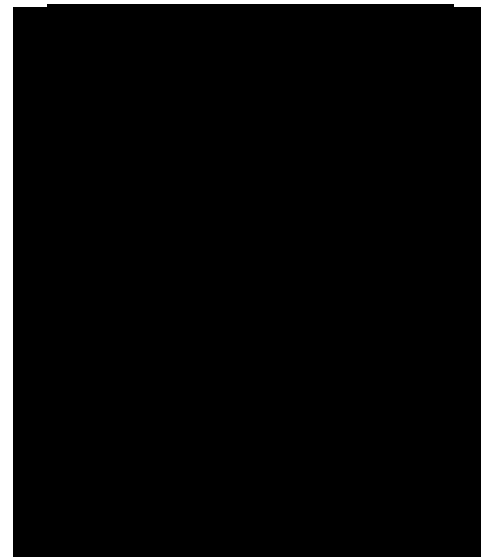
2. Agent's Details (if applicable)

Miss

Jessica

Graham

Associate Planner



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="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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.

When defining Green Belt boundaries, the National Planning Policy Framework (NPPF) states that Local Plans should *"be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period"* (Paragraph 139e). The Council's evidence base acknowledges that there are limited brownfield opportunities left in Solihull so to meet their housing needs Green Belt release was needed for this Local Plan Review and may therefore potentially be needed again in future reviews. The NPPF encourages Councils to identify areas of safeguarded land in order to meet longer-term development needs beyond the plan period (paragraph 139c). However, the Council has not sought to safeguard any land for development as part of the Local Plan Review. This is particularly surprising where the housing requirement for the Borough has been the subject of several key influences, including proposed changes to the standard method and the Greater Birmingham and Black Country Housing Market Area (HMA) shortfall.

In order to be consistent with national policy, we consider that the Council should identify areas of land that could be released from the Green Belt in this Local Plan Review and safeguarded for future development should the Council not be able to meet their housing needs or the housing needs of the HMA during the next plan period.

As stated in our separate response to Policy P5, a significant HMA housing shortfall is expected from 2031 so it is likely that Solihull will need to contribute additional dwellings to assist in addressing this shortfall. Therefore, safeguarding land for the future is needed in order to meet the longer term development needs of the HMA.

When identifying potential sites to release from the Green Belt and safeguard, the Council should choose sites in lower performing Green Belt parcels, which are adjacent to sustainable settlements, accessible and considered suitable, achievable and deliverable in the Council's

SHELAA (Category 1). Our client's land at Smiths Lane, Browns Lane and Widney Manor Road, Bentley Heath (Site reference 207) is a Category 1 site in the SHELAA, has high/medium accessibility as it is located immediately adjacent to Knowle Dorridge and Bentley Heath and the site is in a lower performing parcel of Green Belt. In addition to providing housing, our client is also proposing to designate circa 2.2ha for a community facility (potentially a 3FE primary school) so there will be significant social benefits, as well as economic and environmental benefits in allocating this site. We therefore consider that Site 207 should be considered for either a residential allocation within this plan period to be safeguarded to meet the housing needs for the next plan period.

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.

To provide a plan which is more effective and responsive to these variables we consider that the Council should have tested a number of scenarios and provided appropriate allocations and safeguarded areas to enable them to flexibly respond to the ever changing circumstances. We request that the Council consider identifying areas of land that could be released from the Green Belt in this Local Plan Review and safeguarded for future development should the Council not be able to meet their housing needs or the housing needs of the HMA during the next plan period. Our client's site (Site Reference 207) should be considered for a residential and community facility allocation or be safeguarded for future development.

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 St Philips

Date:

09/12/20