



# KDBH Neighbourhood Forum

## Representations on Solihull Council's Submission Draft Local Plan: Concept Masterplans, General Matters

### 1 Summary

It should be made clear that the concept masterplans are an integral part of the Local Plan and that adherence to key principles will be required; also, that only minor changes are envisaged in the future.

### 2 Representations

*See also Forum representations on Policy P5 - Concept Masterplans.*

In addition to containing detailed masterplans, the volume "Solihull Local Plan Concept Masterplans", October 2020 has general material in the form of an Executive Summary, Introduction and Methodology. These representations relate to that part of the volume.

#### Executive Summary

The Executive Summary to the volume of concept masterplans states that the masterplans have been published "alongside" the Local Plan Draft Submission. This is ambiguous and lacking in clarity.<sup>1</sup> In fact, as confirmed by the Council<sup>2</sup>, "*The concept masterplans are intended to be part of the Draft Submission Plan...*". For the avoidance of doubt, this fact should be made clear in the Executive Summary.

The Executive Summary continues by saying that the masterplans are "*illustrative*" and "*subject to change*". This phrase is also used elsewhere in the text. However, as part of the Local Plan, the concept masterplans are subject to the presumption in favour of the development plan. They cannot be subject to material change outside the examination process. Further, the public would expect to have confidence this is a document that has been tested and adopted after a thorough examination process.

Essential matters and key principles of development should be clearly stated requirements and distinguished from any material that might be illustrative. In this way, the concept masterplans will give a clear steer to developers and confidence to the public. See **Mods 1 and 2**.

#### Introduction

Reference to "*illustrative*" masterplans is repeated in the Introduction. Related modifications will be necessary, as evidenced above. See **Mods 3 and 4**.

#### Methodology

There is a reference to "*illustrative*" masterplans in the Methodology section. This will need correction, as indicated above. See **Mod 5**.

Stage 5 of the methodology states that some emerging plans were shared on an informal basis with Parish Councils and Neighbourhood Forums. The Forum has not, however, had an opportunity beyond the formal consultations to actively contribute to developing the concept masterplans as now proposed, despite repeated requests. Indeed, the Hampton Road concept masterplan is markedly different to earlier versions; early, proactive engagement could have reduced the extent of these representations.

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<sup>1</sup> NPPF Para 16 d)

<sup>2</sup> Email dated 12 November 2020, Policy and Spatial Planning Unit, Solihull Council



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The definition of densities differs from that in the table at para 240 of the Local Plan. The Local Plan table indicates housing densities of 30-35 dph for limited extensions to villages (into which category the Hampton Road site falls); and 30-40 for larger expansion of villages (into which category the Land South of Knowle site falls). The indicative mixed density for both is 40-50 dph. These are not aligned with the low (<30), medium (30-40) and high (40+) of the Concept Masterplan documents. The Local Plan and accompanying Concept Masterplan documents are unclear. Modification is required to provide clarity. **(Mod 6)**

### 3 Modifications

#### Executive Summary

The Local Plan supplementary housing allocations document seeks to provide over 5,300 dwellings on new sites to be allocated for development. ~~This volume of concept masterplans has been published alongside the Local Plan Submission Draft.~~ The Council's analysis and requirements are set out in this volume of concept masterplans which forms an integral part of the Local Plan. **(Mod 1)**

This study has tested the capacity of sites for housing delivery. The ~~illustrative concept~~ masterplans were developed, with consideration of planning policy and best practice guidance. They are subject to minor change as further infrastructure survey work will need to be carried out at the application stage. However, developers will be required to adhere to the key principles. **(Mod 2)**

#### Introduction

The Masterplan approach is born out of the Council's ambition to accommodate growth with place-making providing the central theme. The ~~illustrative~~ concept masterplans are therefore intended to demonstrate how sites could be brought forward for development in a form which both seek to respond to the Borough's needs and safeguards the long term desirability of Solihull Borough as a place to live and work. **(Mod 3)**

Each concept masterplan sets out at a broad level how the sites ought to be developed and the likely housing capacity. The concept plans have been developed in collaboration with the site owners and/or promoters.

Once allocated in the Local Plan all sites will need to be brought forward in a manner which reflects both national and local plan policies. This will require additional survey work which is current at the time of application. This may result some minor changes to the ~~illustrative~~ masterplans. **(Mod 4)**

#### Methodology

These stages are reflected in the methodology outlined, however due to the complexity of the sites and the need to engage and involve stakeholders throughout the process, the stages are more iterative reflecting the level of review of the ~~illustrative~~ masterplans. **(Mod 5)**

Clarify and align the terminology relating to densities in paragraph 240 of the Local Plan and the Concept Masterplan methodology. **(Mod 6).**