



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy P5 - Concept Masterplans

1 Summary

Concept masterplans are discussed in the justification to Policy P5. However, they are not addressed within the policy itself. Given their importance, key provisions should be included within the strategic policy. The provisions also need to be strengthened so as to give confidence to the public and a clear steer to developers. The status of the concept masterplans as part of the Local Plan needs to be confirmed.

2 Representations

Concept masterplans are discussed under the justification for Policy P5 - Provision of Land for Housing (at Paras 242 and 243). However, unlike all other matters in the justification, they are not mentioned within the policy itself. Their formal role and status are uncertain. The Plan is lacking in clarity.¹

The concept masterplans are central to the delivery of housing development under the Solihull Local Plan 2020. Each of the allocated housing sites has a concept masterplan. The development of some 5,270 dwellings is dependent upon their provisions. As such, it is important that their contribution in meeting the Borough's housing requirement is recognised in the policy; also, for local communities to be confident that what is shown in the concept masterplans is broadly what will be delivered and will not be subject to material change.

As written, the status of the concept masterplans within the Local Plan is uncertain and ambiguous. There is reference to the Concept Masterplan document being read alongside the allocation policies;² but the text does not confirm that the concept masterplans are part of the Plan itself. In this regard, the Council has provided clarification in an email dated 11 November 2020.³ This states that, "*The concept masterplans are intended to be part of the Draft Submission Plan...*". However, the matter needs to be clear from a reading of the Plan.

A further point of concern is the permanence of the concept masterplans. The allocation policies allow for departure from the concept masterplan principles by indicating that any significant departure would need to be justified and applications demonstrate that the overall objectives for the site and its wider area are not compromised.⁴

However, all important development principles should be a matter of policy. The Plan should not relegate to the concept masterplans the identification of the principles with which the development should be consistent. All important matters should be set out in policy and tested through the examination process. Later material changes would not be acceptable and would undermine public confidence.

¹ NPPF Paras 16 d) and 35 d) refer

² For example, see Policy KN1 7

³ Email dated 12 November 2020, Policy and Spatial Planning unit, Solihull Council

⁴ See, for example, Policy KN1 7



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For further clarity, amended policy should refer to the essential matters to be included within concept masterplans including key principles. Although referred to in the text⁵ (and in the allocation policies with regard to principles⁶), fundamental requirements should be determined by the strategic policy. Thus, for example, all key development principles relating to the development of sites Policies KN1 - Hampton Road, Knowle and KN2: South of Knowle (Arden Triangle) should be set out in those policies and demonstrated within the respective concept masterplans. See **Mods 1 and 2**.

Changes necessary to ensure consistency with national policy, introduce clarity and avoid ambiguity are set out below. Consequential changes to the allocation policies are dealt with in other representations, notably to Policies KN1, KN2 and their respective Concept Masterplans.

3 Modifications

Policy P5 - additional paragraph (Para 7)

Concept Masterplans

7. Development on allocated housing sites shall be carried out in accordance with the related concept masterplan and the principles set out in the housing allocation policies. The content shall be as prescribed in the Local Plan.⁷ **(Mod 1)**

Para 242 - addition to text

- 242 The Council has prepared a concept masterplan for each site to ensure confidence on capacity and deliverability. These form part of the Local Plan and are to be found in X.⁸ Concept masterplans include details on: **(Mod 2)**

⁵ See Paras 242 and 243 and Policy P4C

⁶ See, for example, Policy KN1 7

⁷ See Paras 242 and 243 and Policy P4C

⁸ Insert location of Concept Masterplans (eg appendix or separate volume)