



## 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](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\*

*\*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.*

#### 2. Agent's Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Mark"/>	<input type="text" value="Jessica"/>
Last Name	<input type="text" value="Horgan"/>	<input type="text" value="Graham"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="Savills (UK) Limited"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="55 Colmore Row"/>
Line 2	<input type="text"/>	<input type="text" value="Birmingham"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="C/O Agent"/>	<input type="text" value="B3 2AA"/>
Telephone Number	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>

## 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.

Policy P4D requires allocated sites of 100 dwellings or more to contribute 5% of open market dwellings in the form of self and custom build plots on each of the development sites. We do not support this requirement as the Council should not seek to burden developers with responsibility for delivery of self & custom build plots contrary to national guidance which does not require allocate sites to contribute land for self and custom build plots (Planning Practice Guidance (PPG) Reference ID: 57-025-201760728). In accordance with the PPG, the Council should only “*engag[e] with landowners who own housing sites and encourag[e] them to consider self & custom build*” [Savills emphasis].

The National Planning Policy Framework requires policies to be underpinned by relevant and up to date evidence (paragraph 31). The PPG states that the Council should provide an assessment of demand including a review of data held on the Council’s Register (Reference ID: 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (Reference ID: 57-0011-20160401). Paragraph 195 of the Submission Draft states that there are 370 individual entries on the Council’s ‘Self Build and Custom Housebuilding Register’. The register may provide an indication of the level of interest, but this needs to be analysed in further detail to uncover the specific requirements of respondents. Furthermore, this register does not test whether people have the means to acquire the land and privately construct their own property.

In addition to the above, there is no evidence provided as to how the threshold of 100 dwellings was calculated nor the provision of 5%.

In light of the above evidence not being provided, we do not consider that the requirements of Policy P4D are justified and is therefore unsound.

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.

There is no robust evidence of demand for allocated residential sites of 100 dwellings to provide self or custom build plots therefore we consider that this requirement should be removed from the Local Plan. The Council should only encourage landowners to provide these plots where appropriate.

**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 landowner

Date:

14/12/20