



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.*

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

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 P4E requires major residential development sites to be built to Category M4(2) building regulations and at least 5% of dwellings to be wheelchair user friendly (Category M4(3)). The National Planning Policy Framework (NPPF) requires all policies to underpinned by relevant and up to date evidence which should be adequate and proportionate (paragraph 31). The Planning Practice Guidance (PPG) states that Councils have the option to “*set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access*” where there is a justified need for this requirement (Reference ID: 56-002-20160519). Therefore Policy P4E must be supported by robust evidence. The PPG (Reference ID: 56-005-20150327 to 56-011-20150327) sets out the evidence necessary to justifying a policy requirement for optional standards which includes:

- the likely future need;
- the size, location, type and quality of dwellings needed;
- the accessibility and adaptability of the existing stock;
- variations in needs across different housing tenures: and
- viability.

The Council’s Housing and Economic Development Needs Assessment (HEDNA) includes information on the proportion of older people in the Borough but there is no evidence on the accessibility and adaptability of the existing housing stock which could be adapted to meet the needs of the older population. Recent research undertaken by Savills “Delivering New Homes Resiliently” (October 2020) shows that over 60’s households “*are less inclined to buy a new home than a second-hand one, with only 7% doing so*”. We therefore consider that reviewing the existing housing stock is an important consideration that should be factored into the Council’s review of housing for older and disabled people in the Borough.

There is also no justification to support the requirement for 95% of dwellings to be built to M4(2) standards.

Policy P4E includes 4 criteria (Point 5) for how the policy will be applied flexibly which relate to: viability; the need to achieve a successful development; and whether the standards would prejudice the realisation of other planning objectives. However, the Policy has failed to take into account site specific factors such as vulnerability to flooding, site topography and other circumstances, which make a site unsuitable for M4(2) and M4(3) compliant dwellings (PPG Reference ID : 56-008-20150327).

Policy P4E also requires developments of 300+ dwellings to provide specialist housing or care bedspaces. We do not consider that the Council has provided sufficient evidence to justify how the 300 dwelling threshold has been determined or that specialist and senior living providers will be interested in sites as small as 0.5ha (this is the area used in the Council's viability appraisal). We consider that the requirement for 300+ dwellings sites to deliver specialist housing or care bedspaces should be removed from this policy and instead specific and suitable sites which accord with Point 6 of Policy P4E should be allocated within the plan to deliver this provision.

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.

All new homes are built to Building Regulation Part M Category 1 standards which are sufficiently accessible. No sufficient evidence has been provided to justify the requirement for dwellings to be built Category M4(2). Therefore, the requirement for all dwellings to be built to Category M4(2) standards should be removed and any proposed requirement should be based on an appropriate assessment of need (including a review of the existing housing stock).

The criteria listed under Point 5 of Policy P4E should be amended to state "*Site specific factors which may make step-free access unsuitable or unviable*". For example not every site identified is flat and able to accommodate level access in a uniform matter.

The requirement for 300+ dwellings to deliver specialist housing or care bedspaces should be removed from this policy and specific sites for specialist and senior living should be allocated to deliver this specialist provision. This will ensure that the requirements of Point 6 are met.

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