



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 P5 states that the Council will allocate at least 5,270 dwellings to meet their housing requirement of 15,017 dwellings between 2020 – 2036. We consider that Policy P5 needs to clearly state that the housing requirement figure of 15,017 is a 'minimum' requirement. Paragraph 16 of the National Planning Policy Framework ('NPPF'), requires plans to "*be prepared positively, in a way that is aspirational but deliverable*". The NPPF (paragraph 59) and Planning Practice Guidance ('PPG') (Reference ID: 2a-010-20190220) also set out the Government's objective of significantly boosting the supply of homes. The Prime Minister has also recently noted the importance of building new homes in both his 'Build, Build, Build' speech (June 2020) and in the foreword of the 'White Paper – Planning for the Future' consultation document (August 2020). We currently do not consider that the housing requirement is 'aspirational'.

The housing requirement for the Borough equates to 938 dwellings per annum. Using the current standard methodology, the minimum housing need for Solihull equates to 807 dwellings per annum (12,912 dwellings over the plan period). The PPG states that the standard methodology is the minimum starting point and does not produce a housing requirement figure (Reference ID: 2a-010-20190220). The PPG sets out different circumstances for increasing the minimum housing need figure, although the list is not exhaustive. This could include meeting unmet need from neighbouring authorities or previous levels of housing delivery (Reference ID: 2a-010-20190220). The Submission Draft (paragraph 221) and Housing & Economic Development Needs Assessment (HEDNA) 2020 set out that the commuter patterns of growth relating to UK Central Hub justify an increase in the Borough's housing need. This increase along with a contribution towards the HMA shortfall result in the Borough proposing a requirement of 938 dwellings per annum. However, we consider that there is justification for the housing requirement figure to be increased as we have set out below.

The Government has recently confirmed its intention to review the standard methodology (August 2020). Using the Government's revised standard methodology that was published for consultation, the minimum housing need figure for Solihull could increase by 25% to 1,011 dwellings per annum (16,176 dwellings between 2020-2036). This could equate to a total minimum housing requirement of 3,264 more dwellings than the proposed housing requirement figure between now and 2036. In order to demonstrate a robust approach at Examination and to be able to present a positively prepared Local Plan (NPPF paragraph 35), we consider that the Council should plan for additional growth than currently proposed and identify additional sites which could be allocated if the Inspector requires the Council to plan for growth in accordance with the revised standard methodology figure or if they agree with our findings set out below that the UK Central Hub area is unlikely to deliver 2,740 dwellings by 2036.

The Council is under a Duty to Co-operate with other Local Planning Authorities (LPA) on strategic matters that cross administrative boundaries (NPPF paragraph 24). A Statement of Common Ground (SoCG) should be prepared to demonstrate to the Inspector that Solihull has complied with the Duty to Co-operate (PPG Reference ID: 61-010-20190315) and that Solihull has addressed key strategic matters through effective joint working and not deferred them to a subsequent Local Plan Review (PPG Reference ID: 61-022-20190315). We do not consider that the 'Housing Need and Housing Land Supply Position Statement' (July 2020) or the Council's proposed contribution towards the Housing Market Area (HMA) shortfall demonstrates that the Council has undertaken effective and on-going engagement with the other HMA authorities (NPPF paragraph 25). Without a SoCG it is difficult to assess whether the Council has complied with the Duty to Co-operate.

The 'Housing Need and Housing Land Supply Position Statement' claims that the remaining HMA shortfall up to 2031 is now estimated to be only 2,597 dwellings. No evidence has been provided to demonstrate how the unmet need has been met although the Statement claims that additional capacity has come forward in Birmingham. The Statement goes on to highlight that there is an identified shortfall in the Black Country of 29,260 dwellings between 2019-2038 of which 7,485 dwellings arise up to 2031. We therefore consider that the unmet housing need up to 2031 is greater than 2,597 dwellings.

The Council is currently proposing to contribute 2,105 dwellings towards the HMA shortfall (paragraph 2.28 of the Submission Draft document). The NPPF requires that all policies should be underpinned by relevant and up to date evidence (paragraph 31). No evidence has been provided by the Council to justify how the 2,105 dwelling contribution was calculated. Furthermore, it is now apparent that there will also be a significant HMA shortfall post-2031 (minimum 29,260 dwellings). As the plan period for the Submission Draft will cover up to 2036, we consider that this should be addressed within this Local Plan Review and not deferred them to a subsequent Local Plan Review (PPG Reference ID: 61-022-20190315).

Page 69 of the Submission Draft document states that across the plan period the UK Central Hub area is expected to deliver 2,740 dwellings; 2,240 dwellings at the NEC and 500 dwellings at Arden Cross. This equates to 18% of the proposed housing requirement for the Borough (15,017 dwellings). Due to the amount of development proposed in this area, we consider that the majority of dwellings delivered will be apartments. The Council should be targeting to deliver a balanced housing portfolio across the Borough which we do not consider they are currently proposing in directing such a significant proportion of their housing requirement to one area and proposing to deliver high density development. As a result of this allocation, almost 20% of the Council's housing target will be met by high density accommodation. The Council has not provided any evidence to demonstrate that the amount of apartments proposed at UK Central Hub is needed in the Borough, especially when there is an existing family demographic.

In addition, we do not consider that the expected housing delivery for UK Central of 2,740 dwellings up to 2036 is justified or supported by any of the Council's evidence base and is therefore unsound. The Hub Framework Plan (2018) also sets out potential timescales for development coming forward. Table 1 sets out a land use trajectory table which states that between 2018 – 2033 only 1,675 dwellings are expected to be delivered on the Arden Cross

and NEC sites. Between 2018 – 2022, circa 130 - 550 dwellings were expected to be delivered at the NEC. With no planning application submitted at the NEC, we consider it is unlikely that any dwellings will be delivered by 2022. Additionally, some of the Council's evidence base contradicts each other. The NEC masterplan (2018) states that 2,500 dwellings could potentially be accommodated on the site (page 34) whereas the Hub Framework Plan (2018) states that 1,780 dwellings could be delivered at the NEC. We consider that the target for the anticipated number of housing to be delivered at UK Central should be reduced to a more realistic level.

In light of the above, the Council will need to identify additional sites to meet their increased housing need. Our client's land is located between Cheswick Green and Blythe Valley Park (SHELAA reference 173) and is being promoted for circa 600 homes (market and affordable dwellings), a community facility and public open space. The landowner is willing to consider a smaller allocation if this is considered appropriate by the Council. Our client's land offers an opportunity for the future expansion of Blythe Valley Park. There is also the potential to create a footpath link through our client's land between Blythe Valley Park development and Cheswick Green to link both the settlements and improve their footpath / cyclepath accessibility to the employment provision, shops and services that each settlement provides.

Our client's site has not been assessed within the Council's updated Site Assessment (October 2020). Having spoken to the Council, we understand that this has been done in error and the site should have been included. The Council's previous Site Assessment (January 2019) document that supported the Supplementary Draft consultation document identified that there are three 'hard' constraints (River Blythe SSSI, adjacent Listed Buildings and RIGS) on site and various 'soft' constraints (access, adjacent to wildlife sites, Flood Zones 2 and 3 and a high pressure gas pipeline). However, it is considered that these constraints can be overcome and future development of the site can be designed to reduce its impact on the River Blythe SSSI and listed buildings. Although there are identified constraints, the site is located within a moderately performing Green Belt ('GB') parcel, is highly accessible to schools, services and facilities and in the Sustainability Appraisal the site was assessed as having 9 positive (5 significant), 3 neutral and 5 negative effects (1 significant). We therefore consider that the Council should consider Site reference 173 for an allocation to assist the Council in meeting their housing needs.

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.

We consider that the Council should clearly state that the housing requirement figure is a 'minimum'.

In light of the revised Standard Methodology calculation, the identified HMA shortfall up to 2036 and the overly aspirational delivery expectations for the UK Central Site, the Council should plan for additional growth than currently proposed and identify additional sites which could be allocated in the plan. The land being promoted by our client (Site Reference 173) should be considered for a residential allocation.

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)?

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No, I do not wish to participate in hearing session(s)

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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