



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official use
only)

Name of the Local Plan to which this representation relates:

Solihull Draft Submission Plan

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* | 2. Agent's Details (if applicable) |
|--|------------------------------------|
| <i>*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.</i> | |
| Title | Mr |
| First Name | Joseph |
| Last Name | Cramphorn |
| Job Title (where relevant) | Senior Planner |
| Organisation (where relevant) | Savills UK |
| Address Line 1 | 55 Colmore Row |
| Line 2 | |
| Line 3 | |
| Line 4 | Birmingham |
| Post Code | B3 2AA |
| Telephone Number | |
| E-mail Address | |

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation: Hampton Road Developments

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 checked="" type="checkbox"/> | No | <input type="checkbox"/> |
| 4.(2) Sound | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4 (3) Complies with the Duty to co-operate | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> |

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.

This policy does not provide developers with enough flexibility to consider the mix of housing at the planning application stage. The HEDNA sets out a range of mixes for each dwelling size. We support the Council providing some guidance on housing mix but this should accord with the mix proposed in the HEDNA.

The HEDNA also states that there is a clear requirement for both social and affordable rent but has recommended to the Council that they do not propose a rigid mix on the split between social and affordable rented housing. To ensure the policy is effective, the housing mix should be updated and included in the supporting text, rather than the policy so a suitable amount of weight can be applied to the mix on a site by site basis.

We note that criterion 2 of the draft policy states that a Borough definition of "affordable" will be informed by work with the WMCA and build upon national guidance. We consider that national guidance provides a suitable definition of the different types of affordable housing, and can be found in annex 2 of the NPPF.

At criterion 7 and 8 specific mix of the accommodation required in both social rented and shared ownership affordable housing is provided. We have compared the mix set out in the regulation 19 plan to that has been adopted in the Housing Mix SPD (see overleaf):

Regulation 19 Plan

| Bed Size | One bed | Two bed | Three bed | Four bed |
|------------------|---------|---------|-----------|----------|
| Social Rented | 30% | 35% | 25% | 10% |
| Shared Ownership | 15% | 40% | 40% | 5% |

Meeting Housing Needs SPD

5.43 At a Borough level, the Council's assessment of the required size mix of affordable dwellings is as follows:

| Bed Size | 1 Bed/1 or 2 person Flat (note 1) | 2 Bed/ 3 Person Flat | 2Bed/4 Person House | 3 Bed/5 Person House | 4+ Bed/6 Person + House |
|--------------|-----------------------------------|----------------------|---------------------|----------------------|-------------------------|
| Rented | 28% | 0% | 26% | 19% | 27% |
| Intermediate | 43% | 0% | 4% | 36% | 17% |

Note 1: The minimum internal area for a 1 bed flat shall be 45 square metres.

We note that there is a difference in the affordable tenure types proposed between the regulation 19 and meeting Housing Needs SPD. We support the recognition in the regulation 19 plan of the need to deliver more two and three bed homes than is set out in the Housing Needs SPD, reflecting the need for such properties in the Borough.

(Continue on a separate sheet /expand box if necessary)

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 use of a housing mix to guide affordable housing mix is unduly onerous if greater flexibility is not provided. Although there is reference to site circumstances, it should be given more weight within the policy that site circumstances are an important consideration. Reference to a specific mix should not be set out in the policy, rather it should be for guidance only within the supporting text. This would ensure that the policy is sufficiently justified and effective.

Criterion 13 should be deleted, as it is a duplicate of criterion 12.

It is requested that Policy P4A be amended to include reference to a requirement for social and affordable rent rather than purely social rent.

(Continue on a separate sheet /expand box if necessary)

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:

[Redacted Signature]

Date:

14/12/20