



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.

We **object** to the policy setting a market dwelling mix on a borough wide basis and consider it unduly onerous. Consideration of the mix of dwellings should be determined at the planning application stage, following consideration of a range of site specific circumstances, including site capacity and local market needs and demand.

We have compared the market housing mix required by this policy within the regulation 19 plan and the KDBH Neighbourhood Plan:

	Local Plan Review – Policy P4C	Neighbourhood Plan – Policy H3
1-2 Bedrooms	30%	32%
3 Bedrooms	50%	34%
4+ Bedrooms	20%	34%

There is a large difference between the level of 3 and 4 bedroom homes that are requested by the regulation 19 plan versus the requirements of the made KDBH Neighbourhood Plan. We request clarification from the Council which mix should be taken forward if there is a situation in which both housing mixes are part of the Development Plan.

A blanket mix across the Borough or indeed Neighbourhood Plan area should not be taken

forward. Housing mix should be site specific, taking into account the provisions of paragraph 122 of the National Planning Framework (NPPF) which discusses the importance of planning policies to make efficient use of land taking into account factors such as the identified need for different types of housing and the importance of securing well-designed and attractive places. The housing mix proposed in the HEDNA provides a range for each dwelling type which reflects the 'latest' evidence in 2020.

Conclusions drawn from the HEDNA should be taken into account to form a policy which provides advice on the likely mix, but is not rigidly apply the mix to all development sites, rather housing mix should be bespoke to specific sites.

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 request clarification from the Council in respect of which housing mix should be taken forward if there is a conflict between the emerging local plan and the made Neighbourhood Plan.

It unclear if the concept masterplan referred to in criterion 2 are those produced by the Council in respect of allocated sites within the consultation document. If so, we are not aware that the concept plan shows such detail referred to in the policy. Notwithstanding this point, it is not consider that this level of detail should be prescribed at the plan making stage, rather it should be considered in a collaborative approach between the applicant and Council at application stage. Consideration should be given to paragraph 60 and 61 of the NPPF which require market signals to be taken into account when devising a housing mix.

We request that the Council removes reference to mix (point 3) from Policy P4C and instead refer indicative housing mix ranges in accordance with the HEDNA within the explanatory text. Developers should be 'encouraged' and not 'required' to accord with the mixes set out in the explanatory text.

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]

Date:

14/12/20