



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*

**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"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Joseph"/>
Last Name	<input type="text"/>	<input type="text" value="Cramphorn"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation (where relevant)	<input type="text" value="Hampton Road Developments Ltd."/>	<input type="text" value="Savills UK"/>
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"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text" value="Birmingham"/>
Post Code	<input type="text"/>	<input type="text" value="B3 2AA"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address	<input type="text"/>	<input type="text" value="REDACTED"/>

(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 onerous approach being applied in Policy P4D to the delivery of custom and self-build housing. Whilst we recognise this approach may widen housing choice, on large scale allocations there is a risk that this approach could slow down the delivery of housing.

The PPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self & custom build. These are:

- developing policies in their Local Plan for self-build and custom housebuilding;
- using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;
- engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and
- working with custom build developers to maximise opportunities for self-build and custom housebuilding.

There is therefore no requirement for self or custom build to be provided as part of larger allocated sites.

By applying the 5% requirement of Policy P4D, this leads to potentially multiple separate contracts would need to be agreed with interested parties. In addition there are also practical issues to consider, for example the day to day operation of such sites and consideration of potential health and safety issues of having multiple individual construction sites within one development. This therefore represents an onerous requirement.

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. Where suitably evidenced, specific sites could be allocated for self-build and/or custom housebuilding.

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.

The Council should provide a robust assessment of demand including an assessment and review of data held on the Council's self-build register. The register may provide an indication of the level of interest, but this needs to be analysed at a deeper level to uncover the specific requirements of respondents. Without this exercise having been undertaken and supporting the Council's conclusions, the policy is not justified.

The policy should be amended to allow for the provision of such plots to be left to the discretion of the developer based on market trends, which are liable to change over the plan period. On larger sites we consider this requirement should be left to the developer's discretion. This would ensure that the policy is suitably justified.

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