



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	<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.

Both criterion 2 & 3 seek to apply requirements of the building regulations to the Local Plan. We **object** to this, as it is onerous to require anything above and beyond what is required through the Building Regulations.

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. 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** (Savills emphasis).

We therefore consider that the requirement to build all dwellings to Category M4(2) standards should be evidenced and balanced against the need to make the most efficient use of land available, particularly as Solihull is a majority Green Belt authority. Without this approach, the policy will not be consistent with national planning policy or effective, making Policy P4E unsound.

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, none of the criteria make reference to the suitability of a site to accommodate accessible dwellings, for example their topography or local demographic requirements. We consider that the policy should be amended to accord with the PPG (Reference ID: 56-008-20160519) guidance or evidence provided which justifies the position being proposed in the policy.

Criterion 4 states that all development over 300 dwellings must provide specialist housing or care bed spaces in accordance with the Council's most up to date statement of need on older person's accommodation. This policy does not consider existing specialist housing or care provision in the locality and whether any additional provision is needed.

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.

If differing standards are applied, there is potential for a situation to occur in which decisions about technical appropriateness is considered by planning officers, rather than qualified building inspectors. The policy should be amended to remove any requirements above current building regulations where this is not suitably justified.

The requirement for all dwellings to be built to Category M4(2) standards should be removed, unless evidence can be provided to justify this blanket approach or a percentage requirement that is evidenced based on an appropriate assessment of need to ensure that developments can still make the most efficient use of land in accordance with the NPPF (paragraphs 122 and 123).

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.

Any requirements for specialist housing or care accommodation should be the subject of an evidence based review in conjunction with specialist operators, and appropriate locations identified based on this evidence. This would include reviewing existing provision and the need for further provision based on demographic and health trends.

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