



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*		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" value="Miss"/>	<input type="text" value="Miss"/>
First Name	<input type="text" value="Zoe"/>	<input type="text" value="Zoe"/>
Last Name	<input type="text" value="Curnow"/>	<input type="text" value="Simmonds"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Taylor Wimpey"/>	<input type="text" value="Lichfields"/>
Address Line 1	<input type="text" value="c/o agent"/>	<input type="text" value="3<sup>rd</sup> Floor"/>
Line 2	<input type="text"/>	<input type="text" value="15 St Paul's Street"/>
Line 3	<input type="text"/>	<input type="text" value="Leeds"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="LS1 2JG"/>
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="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 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.

Policy P5 seeks to set out how SMBC have allocated sufficient land for housing based on its needs. It is positive that SMBC are seeking to meeting its own housing needs in full (current standard method is 807 per year 2020-36, or 12,912 total), as well as testing how much housing it needs to support employment growth (this increases the number slightly to 816 dpa or 13,056 total).

Looking at the supply, SMBC are seeking to exceed this need at 15,017 new dwellings. This additional circa 2,000 dwellings has been included to meet the unmet needs of Birmingham.

Whilst the above is positive, a number of observations are made which, unless these are addressed satisfactorily, will result in the policy not meeting the test of soundness as defined in the National Planning Policy Framework (NPPF).

Part 1

- A buffer of 5-10% should be incorporated in order to meet the housing requirement and Greater Birmingham and Black Country Housing Market Area (GBBCHMA) contribution and not 5-year housing land supply. This is to ensure there is flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period.
- To this end, the Council would therefore need to identify additional suitable land supply, in the order of c.750-1,500 dwellings.

Part 2

- The trajectory fails to set out the anticipated rate of development for specific sites, against the requirements of NPPF paragraph 73.

P5(1) and (3) Windfall Sites (and para 223)

- An assumed supply of 200 dpa is made for windfall sites, up from 150 dpa within the adopted Solihull Local Plan (2013).
- The Plan purports that 'there is compelling evidence that windfall sites consistently become available in Solihull' (para 223), but although the 5YHLS (July 2019) sets out the number of annual completions from windfall sites, these are not set out on a site-by-site basis and therefore it cannot be concluded on the evidence available these provide a reliable source of supply, as required by NPPF paragraph 70.
- Additionally, although the 5 year annualised average appears sufficient, the level of fluctuation (2015/16: 190; 2016/17: 200; 2017/18: 158) suggest supply may not be sufficient enough to justify a proposed 200 dpa assumption.
- At 150 dpa, a resultant capacity of 2,100 dwellings from 2022-2036 would warrant the Council to identify to facilitate the delivery of a further 700 dwellings.

(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.

The following changes to the policy are required:

- Part 1 – add a 5-10% buffer to the stated housing requirement
- Windfall sites – reduce delivery from 200dpa to 150dpa to reflect windfall delivery.
- Amend the table under paragraph 226 to state 'minimum' or 'indicative' capacity.

(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:

The number of dwellings allocated in the Local Plan is of critical, strategic importance for SMBC and Taylor Wimpey. As the majority landowner for a key allocated site, it is essential that Taylor Wimpey's interests are represented.

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:



Date:

14/12/2020