



Solihull MBC Local Plan Publication Stage Representation Form

Ref:

(For
official
use only)

Name of the Local Plan to which this representation relates:

Regulation 19

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="Michael"/> |
| Last Name | <input type="text"/> | <input type="text" value="Robson"/> |
| Job Title (where relevant) | <input type="text"/> | <input type="text"/> |
| Organisation (where relevant) | <input type="text" value="Kler Group Ltd c/o agent"/> | <input type="text" value="Cerda Planning"/> |
| Address Line 1 | <input type="text"/> | <input type="text" value="5-7 High Street"/> |
| Line 2 | <input type="text"/> | <input type="text" value="Sutton Coldfield"/> |
| Line 3 | <input type="text"/> | <input type="text"/> |
| Line 4 | <input type="text"/> | <input type="text"/> |
| Post Code | <input type="text"/> | <input type="text" value="B72 1XH"/> |
| Telephone Number | <input type="text"/> | <input type="text"/> |
| E-mail Address (where relevant) | <input type="text"/> | <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 sets out that the average annual housing land provision target is 938 net additional homes per year between 2020 and 2036. The Local Plan Review is being brought forward at a time when there continues to be ongoing review of the Government's standard methodology for calculating housing need. In the 2019 calculation, Solihull is required to deliver 807 houses per annum. In the latest consultation version, this figure rises to 1,011 houses per annum. As the PPG makes clear, this is the minimum starting point and is not to be regarded as a housing need figure to plan for.

The plan period base date is likely to be very close to being the adoption date, if not the same date. As a result, for Solihull, the plan period extends some way into the future. This brings into sharp focus the difference between the annual housing target being proposed in the Local Plan Review and the latest figure set out within the Government's standard methodology. Based on the latest emerging position, the Local Plan Review will be falling significantly short of housing need for the Borough.

We recognise the requirement to consider a partial or wholesale plan review within five years of adoption of the Local Plan Review. However, in practice this is a process which the Council can unilaterally decide upon and even if a partial or wholesale plan review is to be undertaken, this is a 3-4 year project based upon the timescales for the preparation of this Local Plan Review. In total, it could be almost 10 years before a review to this Local Plan Review is in place to have regard to the Government's latest standard methodology. In other cases, such as Bedford Inspectors have imposed a timescale upon such a review with the plan being

presumed to be out of date if the timescale is failed

As a consequence, there is a significant period where there will be less open market and affordable housing being delivered than the evidence would indicate which has a significant adverse impact in relation to the economic, social and environmental dimensions to sustainability.

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 commit to the inclusion of a series of reserve sites within the Local Plan Review identified to meet housing requirements in the event that the Government's standard methodology continues to indicate that housing need is significantly higher than that set out within the submission draft plan. This would allow the Local Plan Review to be flexible, to deal with rapid change, and to avoid the delays and resourcing issues associated with a partial or wholesale plan review.

The alternative would be to include a policy within the Local Plan Review requiring the commencement of a separate Site Allocations document, such work to be commenced no later than six months after the adoption of the Local Plan Review, to include a series of reserve sites and to be read in conjunction with the Local Plan Review including adherence to the development strategy.

This is an approach that Stratford upon Avon District have committed to.

One of the advantages is that the site allocations could deal with any deficiency in five year housing land supply, and where it was felt that Green Belt release was required, land could continue to be safeguarded and Green Belt policies apply until such time as any given site was required.

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:

We raise serious issues which go to the heart of soundness. We consider that our submissions are best reviewed orally, along with other participants who will no doubt be making similar representations, to best assist the Inspector(s) in coming to a view as to whether the Local Plan Review should proceed to adoption, modified or not.

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:

14.12.20