



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="Michael"/>
Last Name	<input type="text"/>	<input type="text" value="Davies"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Bloor Homes"/>	<input type="text" value="Savills UK"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="██████████"/>
██████	<input type="text"/>	<input type="text"/>
██████	<input type="text"/>	<input type="text"/>
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██████████	<input type="text"/>	<input type="text" value="██████"/>
██████████████████	<input type="text"/>	<input type="text" value="██████████"/>
E-mail ██████	<input type="text"/>	<input type="text" value="██████████████████"/>

(where relevant)

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 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 do not consider that this policy is effective (NPPF paragraph 35) as it does not provide developers with flexibility and the mix of housing should be considered at the application stage in accordance with the Housing and Economic Development Needs Assessment 2020 ('HEDNA'). For example, as stated under point 9 of Policy P4A, it may be appropriate for sites that are within the town centre to provide a higher percentage of 1 and 2 bedroom dwellings compared to a site on the edge of a rural settlement. The HEDNA sets out a range for of mixes for each dwelling size. We support the Council providing some guidance on housing mix but this should accord with the mix proposed in the HEDNA.

The NPPF (Annex 2) sets out a definition of affordable housing and identifies affordable housing tenures which includes: affordable housing for rent, starter homes, discounted market sales and affordable routes to home ownership. Policy P4A sets out a proposed tenure requirement for 65% social rent and 35% shared ownership within the Borough. The HEDNA has been used as the evidence base to support this policy. The HEDNA has identified that there is a need for affordable rent within the Borough (paragraph 7.101). The HEDNA also states that there is a clear requirement for both social and affordable rent but has recommended to the Council that they do not propose a rigid mix on the split between social and affordable rented housing. Furthermore, shared ownership is a narrow offer of affordable housing that is not social rented. Intermediate housing is considered to be a more appropriate definition to use.

Affordable Rent is also encouraged by Homes England and should be included in the Council's list of tenures. Nevertheless, Policy P4A makes no provision for affordable rent. Therefore

we request that the Policy P4A is amended to refer to both affordable rent and social rent.

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 HEDNA sets out range for the proposed affordable housing mix which provides flexibility, it is not clear how or why the Council has chosen to apply fixed percentage requirements for social rented and shared ownership homes. Each application for residential development should be considered on its merits and the type and mix of affordable housing should be discussed with the Council's housing and planning departments at the pre-application stage. We consider that this will make the policy more effective than simply applying a fixed blanket approach across all residential sites in the borough.

Policy P4A (bullet 6) should be amended to include reference to a requirement for social and affordable rent rather than purely social rent. The policy should also be amended to replace "shared ownership" with "intermediate housing" which includes Shared Ownership, Shared Equity, Discounted Market Housing for Sale etc

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:

Savills on behalf of Bloor Homes

Date:

14/12/20