



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)
Title, First Name, Last Name, Job Title, Organisation, Address Line 1, Line 2, Line 3, Line 4, Post Code, Telephone Number, E-mail Address

(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.

Point 1 of Policy P4C lists a range of criteria that the Council will have regard to when negotiating housing mix on allocated and windfall major development sites. Within the list it notes that the “current indicative Borough-wide needs assessment” and “the existing mix of market housing and local housing demand” will be taken into account. Point 3 of Policy P4C goes on to set out specific requirements for housing mix. 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 application stage in accordance with the Housing and Economic Development Needs Assessment 2020 (‘HEDNA’).

Paragraph 122 of the National Planning Policy Framework (NPPF) sets out the importance of planning policies to make efficient use of land taking into account: the identified need for different types of housing, local market conditions and viability, the availability and capacity of infrastructure, the desirability of maintaining an area’s character and setting and the importance of securing well-designed and attractive places. The housing mix proposed in the HEDNA provides a range for each dwelling type which reflects the ‘latest’ evidence in 2020. However, many sites are different in character and surroundings and therefore a blanket approach to the unit mix is not considered appropriate or sound. Furthermore, market demand can change and so this ‘latest’ evidence may not be representative of need when planning applications are submitted in the future. As developers and national housebuilders have a focus on building and products that are deliverable and meet market needs, the policy should not provide a fixed dwelling mix and a blanket approach to the size and mix should be avoided as not all residential sites will be appropriate for this mix. A rigid approach to mix and house type could have a negative effect on development viability, leading to inflexibility and result in unnecessary delays to developments coming forward.

In addition to the above, the policy does not make any reference to the approach that may be required where there is an existing proposed housing mix set out in 'made' Neighbourhood Plans ('NP').

(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.

We request that the Council removes reference to mix (point 3) from Policy P4C and instead refer indicative housing mix ranges in accordance with the HEDNA within the explanatory text. Developers should be 'encouraged' and not 'required' to accord with the mixes set out in the explanatory text. This is the approach the LPA has taken to density requirements (Policy P5) in the Submission Draft and we consider this flexible approach should be used for market housing mix. Market demand at the time of the application should play an important role in determining the mix of dwellings delivered on a site.

(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:

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