



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.

Policy P4D requires allocated sites of 100 dwellings or more to contribute 5% of open market dwellings in the form of self and custom build plots on each of the development sites. We object to this requirement and do not consider that the Council has provided sufficient evidence to justify a threshold of 100 dwellings or for these sites to contribute 5% self and custom build homes. The PPG (Reference ID: 57-025-201760728) sets out ways in which the Council should consider supporting self and custom build homes which includes: developing policies in their Local Plan for self-build and custom housebuilding and “*engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding*” [Savills emphasis]. There is no requirement in the PPG for self or custom build plots to be provided as part of new housing allocations and landowners should only be ‘encouraged to consider’ promoting their land for self and custom build housing. The policy has been prepared without any regard to the potential for unintended consequences arising from this approach which could have a negative impact on the policy delivering the 5% self or custom built homes. We consider the policy to be ineffective.

Paragraph 195 of the Submission Draft states that there are 370 individual entries on the Council’s ‘Self Build and Custom Housebuilding Register’. The register may provide an indication of the level of interest, but this needs to be analysed in further detail to uncover the specific requirements of respondents. Furthermore, this register does not test whether people have the means to acquire the land and privately construct their own property or whether their requirements align with being located on a large new housing development. Without this exercise having been undertaken and supporting the Council’s conclusions, we do not consider that Policy P4d to be justified or effective.

Furthermore, there are also practical issues to consider in providing self and custom building

housing plots on an allocated site. For example, the day to day operation of such sites and consideration of potential health and safety issues of having multiple individual construction sites within one development. Other considerations that do not appear to be factored in include where a large housing site is the subject of a design code. What approach in the Council expecting self-build projects to take in the design of their “bespoke” self or custom built home?

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 requirement for allocated sites of 100 units or more to provide 5% of open market dwellings in the form of self or custom build plots should be removed from the Local Plan as this policy is not justified or in accordance with national guidance. The provision of self or custom build plots should be the subject of discussion with those who have expressed an interest, and once the Council has an understanding of the type and range of sites that are sought allocations (for example in the form of clusters) should be identified and allocated as self and custom build opportunities around the Borough.

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:

14/12/19