



## 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](mailto:psp@solihull.gov.uk) or Policy and Engagement, Solihull MBC, Solihull, B91 3QB BY Monday 14<sup>th</sup> December 23:59

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This form has two parts –

Part A – Personal Details: need only be completed once.

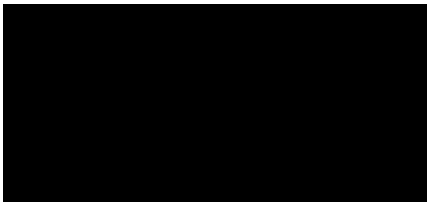
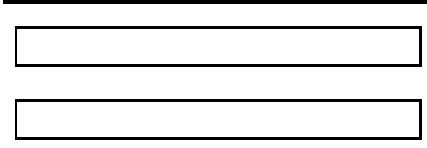
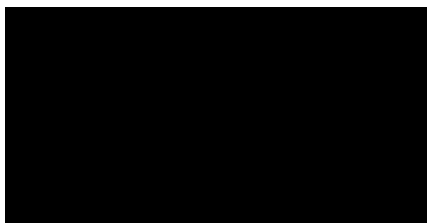
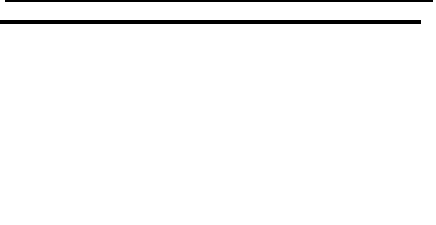
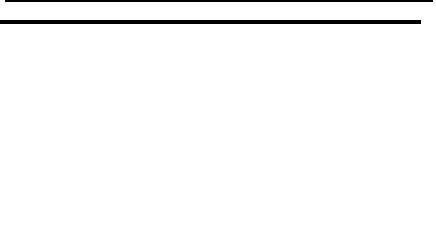
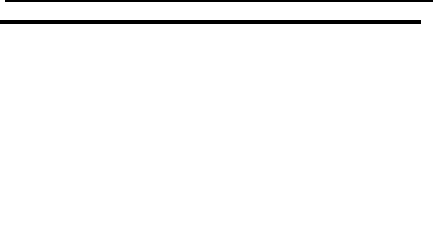
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### 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="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Jessica"/>
Last Name	<input type="text"/>	<input type="text" value="Graham"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Planner"/>
Organisation (where relevant)	<input type="text" value="St Philips"/>	
Address Line 1	<input type="text" value="C/O Agent"/>	
Line 2	<input type="text"/>	
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	
Telephone Number	<input type="text"/>	
E-mail Address (where relevant)	<input type="text"/>	

## 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="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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 (National Planning Policy Framework (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 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 [Savills emphasis]. The housing mix proposed in the HEDNA provides a range for each dwelling type which reflects the ‘latest’ evidence in 2020. However, market demand changes so this ‘latest’ evidence may not be representative of need when planning applications are submitted in the future. As developers and national housebuilders have vested interests in building products that are deliverable and meet market needs, Solihull should not have a fixed size and type guidance, as this could affect development viability, lead to inflexibility and result in obstructing development.

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 remove references to mix (point 3) from Policy P4C and insert indicative housing mix ranges in accordance with the HEDNA within the explanatory text. Developers should be 'encouraged' 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.

**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 St Philips

Date:

09/12/2020