



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 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)
<i>*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.</i>		
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"/>	<input type="text" value="Savills (UK) Limited"/>
Address Line 1	<input type="text" value="C/O Agent"/>	
Line 2	<input type="text"/>	
Line 3	<input type="text"/>	
Line 4	<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 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 P5 states that the Council will allocate at least 5,270 dwellings to meet their housing requirement of 15,017 dwellings between 2020 – 2036. This equates to 938 dwellings per annum. The proposed number of allocated dwellings has decreased by 1,040 dwellings between the Draft version of the Local Plan Review document (January 2019) (6,310 dwellings) and the Submission Draft (5,270 dwellings). From our understanding, three allocations have been removed since the Draft version (Sharmans Cross Road, Jensen House and TRW/The Green) for 790 dwellings, four allocations have increased their capacity (East of Solihull, Lavender Hall Farm, Oak Farm and Pheasant Oak Farm) by 235 dwellings and seven of the remaining allocations have seen a reduction in their capacity by 485 dwellings.

The Housing Land Supply in the table of page 69 of the Submission Draft document states that across the plan period the UK Central Hub area is expected to deliver 2,740 dwellings; 2,240 dwellings at the NEC and 500 dwellings at Arden Cross. This equates to 18% of the proposed housing requirement for the Borough (15,017 dwellings). Due to the amount of development proposed in this area, we consider that the majority of dwellings delivered will be apartments. The Council should be targeting to deliver a balanced housing portfolio across the Borough which we do not consider they are currently proposing in directing such a significant proportion of their housing requirement to one area and proposing to deliver high density development. The Council has not provided any evidence to demonstrate that the amount of apartments proposed at UK Central Hub is needed in the Borough, especially when there is an existing family demographic.

Furthermore, having reviewed the evidence base for the UK Central Hub area, we do not consider that 2,740 dwellings will be delivered at the NEC and Arden Cross between now and 2036. Firstly, the evidence documents seem to show different housing figures for the sites, for example, the NEC masterplan (2018) states that 2,500 dwellings could potentially be

accommodated on the site (page 34) whereas the Hub Framework Plan (2018) states that 1,780 dwellings could be delivered at the NEC. The Hub Framework Plan also sets out potential timescales for development coming forward. Table 1 sets out a land use trajectory table which states that between 2018 – 2033 only 1,675 dwellings are expected to be delivered on the Arden Cross and NEC sites. Between 2018 – 2022, circa 130 - 550 dwellings were expected to be delivered at the NEC. With no planning application submitted at the NEC, we consider it unlikely that any dwellings will be delivered by 2022. In light of this, we do not consider that the expected housing delivery for UK Central of 2,740 dwellings up to 2036 is justified or supported by any of the Council's evidence base and is therefore unsound. We consider that the target for the anticipated number of housing to be delivered at UK Central should be reduced to a more realistic level. Furthermore, evidence should be provided to justify almost 20% of the Council's housing target being met by high density accommodation.

Windfall provision has increased by 600 dwellings between the Draft version of the Local Plan Review document and the Submission Draft and is 50 dwellings per annum more than the adopted Local Plan. The National Planning Policy Framework ('NPPF') states that there must be "compelling evidence" that windfall sites will provide a reliable and realistic source of supply having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends (paragraph 70). As Solihull is constrained by Green Belt and there are only limited deliverable brownfield land opportunities (77 dwellings identified on page 69 of the Submission Draft document), we do not consider that 200 dwellings per annum of windfall dwellings is realistic or achievable. Rather than relying on windfall provision, the Council should have additional sites identified and allocated and/or safeguarded for residential development.

Solihull is part of the Greater Birmingham and Black Country Housing Market Area (HMA). The Council's evidence base includes a HMA Position Statement (July 2020) which concludes that the remaining shortfall up to 2031 is now estimated to be only 2,597 dwellings. No evidence has been provided to demonstrate how the unmet need has been met although the Statement claims that additional capacity has come forward in Birmingham. The Statement goes on to state that there is an identified shortfall in the Black Country of 29,260 dwellings between 2019-2038 of which 7,485 dwellings arise up to 2031. We therefore consider that the unmet housing need up to 2031 is greater than 2,597 dwellings.

In relation to the contribution towards the HMA housing shortfall, Solihull is currently proposing to contribute 2,105 dwellings towards the Housing Market Area shortfall (paragraph 2.28 of the Submission Draft document). We do not consider that this is a sufficient contribution from Solihull towards the shortfall (North Warwickshire is contributing a greater amount) and there is no evidence to justify how the 2,105 dwellings was calculated. Furthermore, it is now apparent that there will also be a significant HMA shortfall post-2031 (minimum 29,260 dwellings). As the plan period for the Submission Draft will cover up to 2036, we consider that this should be addressed within the Local Plan Review. The distribution of development between the HMA authorities needs to be agreed and a Statement of Common Ground should be prepared to demonstrate to the Inspector that Solihull has complied with the duty to cooperate (Planning Practice Guidance (PPG) Reference ID: 61-010-20190315) and that Solihull has addressed key strategic matters through effective joint working and not deferred them to a subsequent Local Plan Review (PPG Reference ID: 61-022-20190315).

The housing need figure should be calculated at the start of the plan-making process and kept under review until the Local Plan Review document is submitted for Examination (PPG reference 2a-008-20190220). This is important for Solihull as at the same time as consulting on the 'White Paper – Planning for the Future' document (August 2020), the Government has also confirmed its intention to review the standard methodology. Using the Government's revised standard methodology that was published for consultation, the minimum housing need figure for Solihull could increase by 25% to 1,011 dwellings per annum (16,176 dwellings between 2020-2036). This could equate to a total minimum housing requirement of 3,264 more dwellings than the proposed housing requirement figure between now and 2036.

We consider that the Council could plan for this additional growth by considering the two scenarios that may emerge from the Standard Method calculations. The first option is what the

Council is currently planning for which is using the current Standard Method figure of 807 dwellings. The second option that the Council should consider is the revised Standard Method which could see the annual housing need increasing to 1,011 dwellings. In order to demonstrate a robust approach at Examination and to be able to present a positively prepared Local Plan (NPPF paragraph 35), we consider that the Council should plan for additional growth than currently proposed and identify additional sites which could be allocated if the Inspector requires the Council to plan for growth in accordance with the revised standard methodology figure or if they agree with our findings set out above, that the UK Central Hub area is unlikely to deliver 2,740 dwellings by 2036. The Council should recognise and test that the range of housing growth options that may be derived from changes to the standard method and wider HMA growth requirements and plan for these options.

Point 6 of Policy P5 sets out that appropriate density of new housing will be based on a variety of factors which are listed in the policy. We support the flexibility provided within this policy, however, in order to comply with national policy, we consider that the criteria listed under Point 6 should be the same criteria that are listed under paragraph 122 of the NPPF. Paragraph 122 states that in order to make efficient use of land, planning policies should consider: 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. Currently, Point 6 makes no reference to local market conditions and viability which we consider is an important consideration that should be taken into account when identifying the appropriate density and mix for each site.

In addition to the above, the indicative densities set out under paragraph 240 of the Submission Draft state that the Council will seek to achieve indicative densities of 40dph for houses, 90dph – 150dph for apartments and 50-70dph mixed areas at the UK Central Hub area. The Arden Cross Masterplan shows 13.04ha of land designated for residential use (Page 47). 500 dwellings are expected to be delivered during this plan period once HS2 is completed. Although they are not expected to all be delivered in this plan period, if 3,000 dwellings are expected on the Arden Cross site, densities will need to be circa 250dph – 300dph in order to achieve the Council's target. This is a significant increase on the densities of development currently achieved in Solihull and the Council will need to ensure that the impact of these densities is reflected and considered in the Local Plan Review document. In summary, we consider that the Council should seek to allocate additional sites for residential development within the plan because we consider that:

1. the UK Central Hub site will be unlikely to deliver 2,740 dwellings up to 2036 which could leave a shortfall of circa 700 – 1,000 dwellings;
2. the revised Standard Methodology could increase the Council's minimum housing need by 25%; and,
3. the proposed contribution towards the HMA shortfall is not a sufficient or justified contribution in light of the identified shortfall post-2031 which should be addressed in the Local Plan Review as the plan period runs until 2036.

In light of the above, the Council will need to identify additional sites to meet their increased housing need requirements. St Philips' at Smiths Lane, Browns Lane and Widney Manor Road, Bentley Heath (Site reference 207) is being promoted for circa 250 dwellings, 2.2ha for a community facility (potentially a 3FE primary school to meet identified catholic school place capacity limitations) and public open space. The site is located immediately adjacent to Knowle, Dorridge and Bentley Heath which is identified for expansion in the Submission Draft given its accessibility and sustainability. In the Council's evidence base the site:

- is located within a lower performing Green Belt parcel;
- is located within a Medium / Low landscape parcel;
- has 'Medium / High' accessibility;
- is a Category 1 site in the Site Assessment Paper as it performs well against the suitability, availability and achievability assessments.

In summary, our client's site is high performing potential development site in the Council's evidence base and should be considered for a residential allocation to assist the Council in

meeting their housing needs. We discuss our client's site in further detail in the supporting covering letter.

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.

Having reviewed the evidence base, we consider that the UK Central Hub area will not deliver 2,740 dwellings in this plan period, an additional contribution should be made towards the HMA shortfall and the revised standard methodology requirement should be taken into consideration by the Council before submitting the Local Plan for Examination. In light of this we consider that the Council need to allocate additional sites that have performed well against the Council's evidence base criteria and are in sustainable locations. The land being promoted by St Philips (Site Reference 207) should be considered for a residential allocation as a high performing site adjacent to the sustainable settlement of Bentley Heath.

Amend Point 6 of Policy P5 to accord with the criteria listed in NPPF Paragraph 122 and amend the indicative densities table on page 76 to set out more realistic densities for the UK Central Hub area if 5,000 dwellings are going to be delivered on the UK Central Site (paragraph 830 of the Submission Draft document).

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:

09/12/20