

**Solihull MBC Local Plan DPD  
 Regulation 27 Publication Document  
 Response Form**

For Office Use Only:	
Date	
Ack	
Ref	

Solihull MBC is seeking your comments on the draft Local Plan DPD. At this stage of preparation of the DPD we are only able to accept representations about whether the document is a) legally compliant and b) sound. Further guidance on completing this form can be downloaded at [www.solihull.gov.uk/ldf](http://www.solihull.gov.uk/ldf).

This form has two parts:

Part A - Personal Details

Part B - Your representation(s).

This form will be used as a formal representation of your support or objection to the draft Local Plan DPD. Please fill in a separate Part B form for each comment you wish to make, and attach to Part A.

**PART A: PERSONAL CONTACT DETAILS**

1. YOUR DETAILS		2. AGENT DETAILS (*if applicable)
Title		
Forename		
Surname		
Job Title		
Organisation	Dickens Heath Parish Council	
Address	1 Wharf House	
	Waterside, Dickens Heath	
	SOLIHULL	
Postcode	B90 1UE	
Email address		
Telephone No.		
Mobile No.		

<b>Which is your preferred method of contact?</b>	<b>Email</b>		<b>Post</b>	
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**How we will use your personal information:** *The information you provide will be used by the Council to help prepare the Local Development Framework (LDF) and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the LDF. Additionally, your personal details may be shared with other Solihull MBC departments and partner organisations to ensure our records are kept accurate and to keep you informed of future consultation documents. Please note that the Council is obliged to make representations available for public inspection, this means that with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available for inspection at the Council's principle offices and will also be published on the internet. Should you have any further queries please contact Spatial Planning on 0121 704 6395.*

**PART B: YOUR REPRESENTATION**

<b>Name</b>		<b>Organisation</b>	
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Please fill in the questions below and clearly explain your comments in the relevant sections. Use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

**Q1. Which part of the Draft Local Plan DPD does your comment relate to?**

Chapter Number	8	Page Number	70/71
Policy Number	P5	Paragraph Number	8.3 &8.4

**Q2. Do you wish to support or object to this part of the Draft Local Plan DPD?**

Support		Object	
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**Q3a. Do you consider this part of the Draft Local Plan DPD is:**

Legally Compliant?	Yes		No
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**Q3b. Please use this space to explain your answer above. Please be as precise as possible.**

**Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. 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.**

**Q4a. Do you consider this part of the Draft Local Plan DPD is:**

Sound?	Yes		No	
<b>Q4b. If you consider the draft Local Plan DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.</b>				
<b>Please select</b>	<b>Test of Soundness</b>			
	The strategy is not <b>justified</b> in that it is not founded on a robust and credible evidence base and/or is not considered the most appropriate strategy when considered against the reasonable alternatives.			
	It is not <b>effective</b> in that the document is not deliverable, flexible or suitable for monitoring.			
	It is not <b>consistent with national policy</b> .			
<b>Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.</b>				
Please see attached				
<b>Q4d. If you consider the draft Local Plan DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. 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.</b>				
<p>Firstly, an evidence base to support the components of the allocation should be provided.</p> <p>Secondly, this needs to be available for consultation prior to Submission of the Plan to the Secretary of State as the change proposed is materially different to earlier consultation leading to the need to find additional sites for allocation.</p> <p>Thirdly, for transparency and ease of interpretation the policy should be reworded to set out the overall housing target for the plan period 2006-2028. In addition to this, a residual figure for the number of houses to be delivered could be included for the period 2011-2028 to indicate how this relates to the overall target.</p>				

**Please note your representation should cover all information succinctly and include all the information, evidence and supporting information necessary to support/justify the representation and suggested change.**

**After this stage, further submissions will only be at the request of the Inspector, based on the matters he/she identifies for examination.**

<b>Q5. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate in person at the examination?</b>				
Written representations		Participate at the Examination in Public		
<b>Q5. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:</b>				
<b>Are you attaching any additional sheets that relate to this representation?</b>	<b>No</b>	<b>Yes</b>	<b>No. of sheets</b>	1
<b>Signed:</b>		<b>Date:</b>	2 March 2012	

**All representations must be received at the email or postal address given on this form by 5pm on Monday 5<sup>th</sup> March 2012. Late representations cannot be accepted.**

Completed Forms should be sent to the Spatial Planning team at:

Email: **sustainabledevelopment@solihull.gov.uk**

Post: **Spatial Planning  
Solihull Council  
PO Box 19  
Solihull  
B91 9QT**

<b>Please tick this box if you DO NOT wish to be notified when the Local Plan DPD is submitted, upon publication of the Inspector's Report and Adopted or be involved in the preparation of future plans and policies.</b>	
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Additional copies of this form can be accessed from the Local Development Framework webpage at [www.solihull.gov.uk/ldf](http://www.solihull.gov.uk/ldf). If you have any further queries, please contact the Spatial Planning team on 0121 704 6395.

**Thank you for taking the time to complete this representation.**

#### Q4c

The policy is confusing in the way the target is expressed and the revised target is not supported by a robust and credible evidence base and is therefore not justified. It is not effective as the policy is not clearly worded and therefore not easily monitored. It should refer to 'delivery' of housing not 'allocation of sites'.

Policy P5 states a housing target that has changed from that set out in the Emerging Core Strategy Consultation Sept 2010 and no evidence base is provided to support why this change has come about. This Pre Submission plan is the first time there been any consultation on the revised information.

The policy is confusing as there is no overall housing target stated. This overall target has to be the starting point to identify the number of houses to be allocated and delivered in the plan period.

Policy P5 refers only to an allocation of land for 4,040 net additional homes and a residual figure of 8,930 additional homes for the revised plan period 2011-2028. This compares to the Emerging Core Strategy which refers to land for new housing to meet a target of 10,500 dwellings 2006-2026 and a residual of 8,400 2010-2026 (Policy 4) which is a very different way of expressing it.

The justification for Policy P5 states '*it is considered 11,000 net additional homes can be delivered towards meeting projected household growth of 14,000 households (2006-2028)*' but it is not clear whether the overall target is 11,000 or 14,000 and as these figures differ from the previous policy how these revised figures have come about.

The policy appears to suggest that the target is driven by potential land available which can accommodate 11,000 houses towards a need stated as 14,000 households over a plan period two years longer (2006-2028).

There is no evidence base to show how 10,500 houses have become 11,000 houses and where 14,000 households now arise from.

The plan period has been extended by two years which further confuses how the target has changed.

The most recent credible and published evidence that has been tested through examination is that of the RSS Phase 2 Revision Panel Report that stated a target of 10,500 for the period 2006-2026. As the planning system is moving towards a 'bottom up' rather than 'top down' approach and more recent household projections have been published the circumstances may have moved on but this needs to be set out in a clear and transparent form for residents to view and understand.

The Strategic Housing Market Assessment available on the council's web site as evidence is undated but refers to 2008 household projections such that it is presumed to post date the RSS Phase 2 Revision Panel Report. This does not in any event definitely provide evidence for any particular target.

The housing figure may essentially be Solihull's own target geared towards the Borough's future housing needs but this must be supported by a robust and up to date evidence base for the Plan to be sound in accordance with the requirements of PPS12.