

Policy & Spatial Planning
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15th March 2019

Dear Sir / Madam

SOLIHULL DRAFT LOCAL PLAN SUPPLEMENTARY CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following answers in response to the Council's consultation document.

Local Housing Need

Question 1 .Do you believe that there are exceptional circumstances that would justify the Council using an alternative approach, if so what are the exceptional circumstances and what should the alternative approach be?

As set out in the 2019 National Planning Policy Framework (NPPF) the determination of the minimum number of homes needed should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). There are no exceptional circumstances to justify the Council using an alternative approach to the Government's standard methodology. The Council should use the Government's standard methodology as set out in the 2019 NPPF and revised National Planning Practice Guidance (NPPG) published on 19th February 2019. Using 2014 based Sub National Household Projections (SNHP) of 621 households per annum and an affordability ratio of 7.77 as published in 2018 the minimum starting point for assessing local housing need in Solihull is 767 dwellings per annum.

This figure is only the minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to the local housing need figure. The



Government's objective of significantly boosting the supply of homes remains (para 59). It is important that housing need is not under-estimated. The Council is encouraged to be as ambitious as possible when planning for housing.

As set out in representations from respondents including other Housing Market Area (HMA) authorities to the Council's previous consultation on the Local Plan there is no clear justification for 2,000 dwellings as the chosen figure for Solihull's contribution to the HMA shortfall and opportunities exist to make a greater contribution. The potential revision of this contribution figure and its relationship with the recommendations of the Strategic Growth Study (SGS) commissioned by the fourteen Greater Birmingham HMA authorities will be consulted on at the pre-submission Local Plan publication stage in summer 2019. The HBF will submit representations on the proposed overall housing requirement figure in response to the pre-submission Local Plan consultation.

Site Selection Methodology

Question 2. Do you agree with the methodology of the site selection process, if not why not and what alternative/amendment would you suggest?

The HBF do not comment on the merits or otherwise of individual sites selected for allocation. When selecting housing sites for allocation the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The Council should also provide maximum flexibility within its overall housing land supply to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.

The HBF have no comments on site specific questions for Balsall Common (**Questions 3 – 10**), Blythe (**Questions 11 – 15**), Hampton in Arden (**Questions 16 – 18**), Hockley Heath (**Questions 19 – 21**), Knowle, Dorridge & Bentley Heath (**Questions 22 – 24**), Solihull Town Centre & Mature suburbs (**Questions 25 – 28**), Meriden (**Questions 29 & 30**) and North Solihull, Marston Green & Castle Bromwich (**Questions 31 – 33**).

Green Belt

34. Should the washed over Green Belt status of these settlements / areas be removed, and if so what should the new boundaries be? If not why do you think the washed over status of the settlement should remain?

The status of Cheswick Green, Millison's Wood, Tidbury Green, Whitlock's End and Widney Manor Road should be determined in accordance with the 2019 NPPF (para 139).

35. Should the washed over status of these settlements/areas remain? If not why not?

The washed over Green Belt status of Barston, Chadwick End, Berkswell and Bickenhill should be determined in accordance with the 2019 NPPF (para 139).

36. Are there any other areas of the Borough where washed over status should be reviewed, if so which areas and why?

Any review of other areas of the Borough washed over by Green Belt should be undertaken in accordance with 2019 NPPF (para 139).

37. What compensatory provision should be made for land being removed from the Green Belt?

Any compensatory provision made for land removed from the Green Belt should be determined in accordance with the 2019 NPPF (para 137).

Omission Sites

The HBF have no comments on omission sites (**Questions 38 & 39**) (see answer under Site Selection Methodology).

Affordable Housing Policy and Open Market Housing Mix

Question 40. Would the above approach of requiring affordable housing contributions of 40% of total square meterage or habitable rooms / floorspace incentivise developers to build more smaller market housing?

The Council's proposed approach is confused. The Council is attempting to deal with identified issues associated with market housing mix including more smaller market dwellings, increasing housing densities on all sites and minimising release of Green Belt land via an alternative approach to affordable housing contributions. These matters are separate and should not be co-joined. It is inappropriate to deal with these matters via the Council's affordable housing policy. These matters should be separately and appropriately dealt with in accordance with the 2019 NPPF.

The Council has provided no justifying evidence that the proposed alternative approach of requiring affordable housing contributions based on total square meterage or habitable rooms / floorspace rather than number of units will incentivise developers to build more smaller market housing.

It is noted that the wording of Question 40 states a requirement for affordable housing contributions on the total square meterage or habitable rooms / floorspace. If the Council sought affordable housing contributions on the totality

this would not comply with affordable housing site thresholds set out in the Written Ministerial Statement dated 28 November 2014 and the 2019 NPPF (para 64).

As set out in the HBF response to the Council's previous consultation on the Local Plan the requirement for 40% affordable housing provision should be fully justified and viability tested. The HBF will submit further representations on this matter in response to the pre-submission Local Plan consultation.

Question 41. If so, what is the most effective approach? Is it to calculate affordable housing as: (a) 40% of bedroom numbers, (b) 40% of habitable rooms, or (c) 40% of habitable square meterage?

The calculation of affordable housing contributions on bedroom numbers, habitable rooms or habitable square meterage are not considered an effective approach. It is standard practice that affordable housing contributions are calculated on the basis of numbers of units. The Council's proposed alternative approach will not provide the necessary certainty for developers or decision makers with regard to its implementation. The use of any of these methods of measurement will not provide a clear indication of the number of affordable units that may be required causing difficulties for an applicant to undertake the appropriate viability assessment required when bring land forward for development. The divergence from a number of units approach will slow down the processing of planning applications and as a consequence housing delivery by requiring far more negotiation between the Council and applicants.

The Council's viability evidence as previously undertaken was not based on this proposed alternative approach. New viability evidence would have to be carried out by the Council to support any change in the Council's approach. The Council would have to explain the relationship between site thresholds for the provision of affordable housing and its calculations (also see answer to Question 40 above).

Question 42. What is the best way of measuring developable space for this purpose: bedroom numbers, habitable rooms or habitable floorspace?

It is an inappropriate approach irrespective of the way used to measure developable space (also see answers to Questions 40 & 41 above).

Question 43. What other measures would incentivise developers to build more smaller market housing?

All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as families, older people and / or self-build rather

than setting a specific housing mix on individual sites. The Council should ensure that suitable sites are available for a wide range of types of developments across a wide choice of appropriate locations (also see answer to Question 2 above).

Conclusion

It is hoped that these representations are of assistance to the Council in preparing the next stages of the Solihull Local Plan which to be found sound under the four tests of soundness as defined by the 2019 NPPF should be positively prepared, justified, effective and consistent with national policy (para 35). If the Council requires any further assistance or information please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans