

## **Submission on behalf of Golden End Farms**

### **Solihull LPR Draft Submission Plan**

**December 2020**

## **Policy P4A: Meeting Housing Needs – Affordable Housing**

### **Q5. General comments on soundness of policy**

1. Whilst we support the general approach in the Draft Submission Plan of securing 40% affordable housing as part of new developments (given the significant need for affordable housing in the Borough that exists) we disagree with one aspect of the detailed wording of Policy P4A which does not comply with national policy and is therefore not sound.
2. In Policy P4A paragraphs 1 and 2 the Plan states that the Borough definition of 'affordable' will be informed by work with the WMCA and build upon the definitions in national guidance. Paragraph 1 acknowledges that affordable housing tenures include social rented, affordable rented, intermediate tenure and starter homes.
3. However, Policy P4A paragraph 6 sets out the tenure split the Council will seek to secure. It states that 65% of the affordable housing should be provided for social rent and the remaining 35% for shared ownership (intermediate). Paragraphs 176, 177 and 178 of the Draft Submission Plan however refer to the other tenures of affordable housing which might be supported by the Council, and notably paragraph 177 states the Council supports the inclusion of discounted market products as may be required by national planning guidance. However, the policy wording itself in paragraph 6 is totally inflexible in this respect and doesn't reflect the Council's stated position or emerging Government Policy on 'First Homes', or other discounted market products that might be introduced. Policy P4A paragraph 6 therefore needs to be amended to be consistent with P4A paragraphs 1 and 2 and paragraph 177 in order to be ready to reflect national guidance on affordable housing and to ensure that the provision that is secured caters for all tenure needs to enable mixed and balanced communities to be created.

### **Q6. Specific modifications requested**

1. Policy P4A paragraph 6 should be amended to make clear that the suggested split of affordable tenures will relate only to the element of affordable housing that is not provided as discounted market products. This will ensure the policy is flexible enough to respond to emerging Government Policy and accommodate discounted market products such as the emerging policy on First Homes. An additional paragraph in the policy also needs to be included to set out the appropriate mix of unit sizes within this category.