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LPR Consultation Policy and Delivery
Solihull MBC
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Our Ref: LS M5/0322-14

By email only:
psp@solihull.gov.uk

Dear Sir/Madam

RE: SOLIHULL LOCAL PLAN REVIEW DRAFT SUBMISSION

We represent the **West Midlands Housing Association Planning Consortium** (HAPC) which includes leading Housing Associations (HAs) across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the West Midlands region.

As significant developers and investors in local people, the HAPC is well placed to contribute to local plan objectives and act as long-term partners in the community. We welcome the opportunity to make comments on this document.

Policy P4A Meeting Housing Needs – Affordable Housing

Definition

The up-to-date national definition for affordable housing is *“housing for sale or rent, for those whose needs are not met by the market”* and can be found in Annex 2 of the NPPF. We see that the definition for affordable housing included in Policy P4A has not been updated in line with this definition. We therefore recommend that the following line is removed:

“Affordable housing includes social rented, affordable rented, intermediate tenure and Starter Homes, which is available at below market price or rent and which is affordable to households whose needs are not met by the market.”

This should be replaced with a sentence which refers readers to the definition set out within the NPPF, and perhaps in this region, the local definition set by the West Midlands Combined Authority. Including a line which aligns the definition of affordable housing within the NPPF will ensure longevity as the Local Plan will remain up to date with changing national policy and innovative new models of affordable housing which can maximise delivery across the plan period.

Evidence Base

We are pleased to see that the Council has, since the previous consultation, undertaken a Housing and Economic Development Needs Assessment (HEDNA). This will help to ensure that the local plan meets identified housing needs in the area, accounting for a broader range of affordable housing definitions as introduced by the NPPF revisions. We are pleased that the HEDNA (2020) does not include the private rented sector in its calculation of affordable housing need even with Local Housing Allowance.

Affordable housing threshold

We are pleased to see that the Council sets an ambitious threshold of 40% affordable housing on site from qualifying residential developments. This will assist in the Council delivering as much affordable housing as possible in order to meet the HEDNA (2020) identified need of 578 affordable homes per

annum over the plan period. The scale of need means that the Council is justified in seeking to secure as much affordable housing as viability allows. It is positive to see that the supporting text acknowledges the significant consequences of unmet need (paragraph 167).

Entry level exception sites

We welcome the inclusion of paragraph 177 which shows support for entry-level exception sites; a policy approach which was introduced by the NPPF revisions. Entry-level exception sites have been widely welcomed as an addition to the opportunities housing associations have to meet housing needs in areas that may not otherwise have been considered suitable for general housing proposals.

Policy P4B – Meeting Housing Needs – Rural Exception

In relation to rural exception sites, paragraph 77 of the NPPF states:

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this.”

As such, we suggest that text should be added to Policy P4(B) or to the supporting text accompanying the policy which allows for the delivery of affordable housing through cross-subsidy where it can be demonstrated that affordable housing development cannot be achieved without an element of open market housing. This will encourage continued delivery of affordable housing across the borough at a time when economic circumstances and reductions in Government subsidy have significantly reduced the viability of affordable housing developments.

With the level of affordable housing in the region being identified as particularly high in the HEDNA (2020), this addition and certainty could make a marked contribution to addressing the need in the borough.

We note that part 1) ii) of Policy P4B requires that a proposed rural exception scheme is supported by the Parish Council or Neighbourhood Forum. While this would of course be favoured, it is not always possible to obtain community support even where proposals meet local housing needs. As meeting affordable housing needs, particularly in rural areas, is a significant challenge for the Borough it is important that barriers are not artificially placed in the way of delivering high quality affordable housing for local people in need.

Policy P4E – Meeting Housing Needs - Housing for Older and Disabled People

The 2nd bullet point of **Policy P4E** states that *all* new build housing on major development sites must be built to Category M4(2). As stated at paragraph 002 (Reference ID: 56-002-20160519) under *Housing: Optional Technical Standards* of the Planning Practice Guidance (PPG), *“Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.”*

As well as having to demonstrate a *“clear need”* for the introduction of the optional technical standards, local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment. It is not clear if the viability study (October 2020) has assessed the impacts of these standards alongside all of the other policy requirements of the Draft Local Plan against affordable thresholds higher than 40%. While we understand that this is an unusual circumstance for most developers, it is quite common for housing associations to deliver up to 100% of housing on site as affordable. Without these viability studies for these kinds of developments, implementing such technical standards is likely to threaten future delivery of affordable housing on schemes with developers having to negotiate its reduction to achieve viability on schemes.

Policy P5 – Provision of Land for Housing

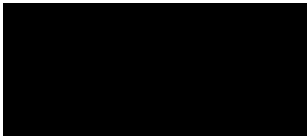
Space Standards

Continuing the theme of optional technical standards, we note that Policy P5 requires *all* new residential development to adhere to Nationally Described Space Standards (NDSS). We are concerned that the blanket application of the NDSS across all residential development, including affordable tenures, will undermine the viability of many 100% affordable development schemes. This will potentially result in fewer affordable homes being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability. In addition, there will be occasions where it is neither practical nor necessary to achieve the standards. Many eligible households in Solihull may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs.

We therefore recommend that this part of Policy P5 is removed unless it can be demonstrated that there is a clear need for such a standard in all residential properties in Solihull. A blanket application of NDSS should also be demonstrated to be viable across various development scenarios through robust viability testing. Following this, it may be appropriate to apply a relaxed standard (with significant justification) where there are greater benefits to do so.

The above comments are intended to be constructive, to ensure the policies are found sound at examination. We would like to be consulted on further stages of the above document and other publications by the Council, by email only to consultation@tetlow-king.co.uk; please ensure that the **West Midlands Housing Association Planning Consortium** is retained on the consultation database, with **Tetlow King Planning** listed as its agents.

Yours faithfully



LEONIE STOATE BSc (HONS) MSc
PLANNER
For and On Behalf Of
TETLOW KING PLANNING



cc: Bromford
Citizen Housing Group
Platform Housing Group