



KDBH Neighbourhood Forum

Representations on Solihull Council's Submission Draft Local Plan: Policy P4A Affordable Housing

Occupation by Households with a Local Connection

1 Summary

Policy P4A does not address occupation by households with a strong local connection. Whilst the local needs of households are covered in Policy P4B, this is only in relation to rural exception sites. There is a failure to recognise the presence of neighbourhood plan policy dealing with local needs affordable housing on allocated housing sites. In addition, differences regarding the tenure split are not acknowledged.

2 Representations

Policy P4A sets out the Council's requirements for the provision of affordable housing in developments providing 10 or more homes. The policy deals with tenure split as well as housing mix for dwellings that are to be both socially rented and in shared ownership. However, there is no reference to occupation by households with a local connection.

Occupation by households with a local connection is addressed, in part, in Policy P4B. This supports local needs housing, but only on rural exception sites. On allocated sites, the Draft Local Plan is silent.

During development of the Knowle, Dorridge and Bentley Heath (KDBH) Neighbourhood Plan, the Forum was at pains to consider local occupation following strong representations by residents. This has found expression in Neighbourhood Plan Policy H2: Affordable Housing which provides for, amongst other things, 25% of all affordable housing to be occupied by households with a strong local connection (as defined in the policy). It applies to all new affordable housing, notably that on allocated sites.

Occupation is referred to in the justification to Policy P4A. Paragraph 182 states,

"The policy in this plan does not cover matters relating to how affordable dwellings will be allocated for occupation... However, where Neighbourhood Plans include a policy relating to the occupation of affordable housing (through for instance a priority being given to those with a strong local connection), then due consideration should be given to the neighbourhood plan."

The reference to "due consideration" is ambiguous and lacking in clarity. A decision maker would not know how to react to a development proposal.¹ Given the presence of a specific neighbourhood plan policy that is both relevant and up-to-date, clearly written mention should be made within Policy P4A. See **Mod 1**.

A second matter of concern in relation to affordable housing is the tenure split that is required under Policy P4A. Paragraph 6 of the policy states: "On-site provision and off site contributions should be calculated based on a tenure split of 65% social rent with 35% provided as shared ownership." This is at variance with the justification, in the KDBH Neighbourhood Plan, to Policy H2: Affordable Housing which states:

¹ NPPF Para 16 d)



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“The Council’s policy seeks 65% of affordable housing to be social rented accommodation and 35% to be for shared ownership. Residents’ views, supported to some extent by the AECOM Housing Needs Assessment, show a strong preference for a higher percentage of the affordable housing provision to be in the form of shared ownership to support more young people and families. This will be pursued with the Council as part of consideration of any planning applications that come forward on strategic sites. This is included as a Community Action in Appendix 4.”

For clarity, the draft Submission Plan should recognise the scope for discussion on the tenure split to be achieved in new affordable housing within Knowle, Dorridge and Bentley Heath. See **Mod 2**.

3 Modifications

In Policy P4A, after Paragraph 8, add the following new paragraph:

The provision of affordable housing on allocated sites to meet the needs of households in that Parish or Neighbourhood will be supported where it is consistent with a neighbourhood plan. (Mod 1)

In the justification to Policy P4A, amend Paragraph 175 as follows:

The Council is justified in defining the tenure of ‘affordable’ homes on the basis that a spread of tenure options is required to satisfy needs and aspirations of households. In determining planning applications, regard shall also be paid to relevant neighbourhood plan provisions. (Mod 2)