

Reviewing the Plan for Solihull's Future

Solihull Local Plan Review

Topic Paper – Meeting Housing Needs

October 2020



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1. Introduction

1. This topic paper is one in a series supporting the Council's Draft Submission Plan which has been published for consultation. The topic papers look at the relevant national and local guidance that impact on the emerging plan. They also provide a summary of the evidence base and how it has been used to shape the Local Plan. The topic papers do not contain any policies, proposals or site allocations and should be seen as explanatory supporting documents.
2. The topic paper covers Local Plan policies P4 (A-E), P5 and P6, in particular:
 - Housing requirement
 - Housing supply
 - Affordable and market housing need by the size, type and tenure
 - Rural exceptions
 - Self and custom housebuilding
 - The needs of different groups in the community
 - Planning use classes.
3. The Local Plan, and this topic paper, adopts the definition of a dwelling set out by MHCLG in its 'Housing Flows Reconciliation', and is consistent with that used in the Census, which is a self-contained unit of accommodation. This means that all rooms including bathroom, kitchen and toilet, in a household's accommodation are behind a single door which only that household can use.
4. The Council will assess whether a development provides the characteristics of a self-contained unit of accommodation. Care developments providing homes with these characteristics will be regarded as dwellings in accordance with the MHCLG definition.
5. Care bedspaces will be counted towards overall housing supply. This will be on a ratio of 1.8 care bed spaces counting as 1 dwelling (i.e. 18 beds in a communal establishment equates to 10 dwellings). This ratio follows the one used by MHCLG in its 'Housing Flows Reconciliation'.

2. Policy Development

Background

6. The current Local Plan was adopted in December 2013. The plan sought to balance projected demographic housing need with constraints, such as Green Belt, and adopted the figure of 11,000 new homes to be delivered over the period 2006-2028, based on the recommendation in the West Midlands Regional Spatial Strategy Phase II Panel Report.
7. The following year, the Local Plan was subject to a successful legal challenge. A High Court judgment was handed down on 30th April 2014 and an Order (“the Order”) was subsequently made on 15th May 2014.
8. The Order treats those parts of the Local Plan relating to:
 - i. the housing land provision target (the target set by Policy P5, its justification, the housing trajectory and the five year housing land requirement); and
 - ii. inclusion of two sites at Tidbury Green within the Green Belts not adopted by the Council and remitted to the Planning Inspectorate for re-examination.
9. The Order is restricted to those parts of the Local Plan directly affected by the Judgment. The majority of the Plan is unaffected and remains adopted, including the allocations.
10. In July 2015, the Council decided to review the Local Plan as a whole, in part to deal with the legal challenge to the housing requirement; and further to address the housing shortfall that is occurring in wider housing market area, and finally to maximise opportunities for potential development around the HS2 Interchange.

Scope, Issues and Options (SIO) (2015)

11. The first stage of the LPR consultation took place from 30th November 2015 to 22nd January 2016. Views were invited on the scope of the review, the issues that ought to be taken into account and the broad options for growth that ought to be considered.
12. The consultation document (available [here](#)) set out the following key issues/questions:
 - That to meet the Borough's own housing needs a housing target of 13,500 dwellings over the plan period to 2033 should be accommodated. This would mean that it would be necessary to identify sites for at least a further 4,000 dwellings over and above those planned to be built under the SLP. But this should be considered a minimum figure.
 - Recognition that under the duty to cooperate Solihull may have to accommodate some of the 37,500 dwelling shortfall that is occurring in the Housing Market Area.
 - The HS2 rail link and interchange presents a major opportunity to maximise the economic and social benefits for the Borough and wider area, which will not be delivered through the HS2 proposal alone.
 - That the vision for UK Central represents one of the most significant opportunities for growth; in particular in the area around the Hub (including the HS2 Interchange site).
 - The need for a comprehensive review of the Green Belt through a Green Belt Assessment.

- The identification of 7 broad potential options for accommodating growth and what opportunities and challenges these options may provide. The broad options sought views on focussing development in the following areas:

A - High frequency public transport corridors and hubs.

B - Solihull Town Centre

C - North Solihull/Chelmsley Wood

D - Shirley Town Centre and the A34 corridor

E - UKC Hub & HS2 Interchange

F - Limited expansion of rural villages and settlements

G - New settlements, large scale urban extensions or significant expansion of rural villages and settlements.

13. The consultation document invited respondents to comment on 27 questions, or to make any other comments they wished to at this stage.

Sustainability Appraisal of Scope, Issues and Options November 2015

14. An interim Sustainability Appraisal (SA) Report was published in November 2015 on the 'Scope, Issues and Options' stage of the Local Plan Review. The SA analysed the proposed changes to the policies and the proposed broad options for growth as explained in the following paragraphs.

Policy P4:

15. The policy performs particularly well against the sustainable communities theme by tackling deprivation and providing a range of housing types, mix and sizes in both urban and rural locations.
16. In light of changes to Building Regulations, the SA recommends providing Category 2 homes as a default standard to increase accessibility.

Policy P5:

17. The intention to meet the housing needs of all residents would increase the beneficial outcomes of the policy in relation to prosperity, access to jobs, housing and health inequalities.
18. A higher housing requirement will, however, result in the release of more land for development that could increase car reliance and use of the M42 corridor.

Broad options for growth:

- Option A – Public transport accessibility can be increased if growth is of a sufficient scale. Could provide opportunity to improve PT links between north and south of the Borough.
- Option B – Considered the most sustainable location for growth, but there is limited additional capacity and potential viability issues.
- Option C – Limited additional scope without adjustments to the Green Belt boundary. Would be a sustainable location to direct development to tackle deprivation.

- Option D – Development could support the vitality of Shirley Town Centre; a good location for access to jobs; opportunities to provide needed affordable and low cost housing, as well as attract workers with easy access to UK Central.
- Option E - The UK Central initiative is anticipated to deliver improved outcomes against prosperity and access to jobs, beyond the borough scale.
- Option F – This option may not deliver the scale of growth required, and limited PT will not offer genuine choice of modes.
- Option G – Further analysis should be undertaken of the ability of landscape and transport infrastructure to accommodate significant numbers of additional housing and the implications for local employment, retail, health and social care.

Consultation Representations

19. The SIO consultation proposed that minor changes be made to Policy P4 'Meeting Housing Needs' and significant amendments be made to Policy P5 'Provision of Land for Housing', as well as comments on the merits of the 7 options for growth.
20. Response to Policy P4 - need to take account of changes in Housing and Planning Act and updated evidence base.
21. Response to Policy P5 - Considerable support for a major amendment to Policy P5. Significant response that 13,500 new dwellings should be regarded as a minimum figure and to take into account the shortfall in the wider housing market area and any under-delivery during the previous plan period. Conversely, concern was expressed that growth should not adversely alter the character of the Borough.
22. Response to options for growth - strong view by local communities that development in urban areas should be considered first and incursions into the Green Belt as a last resort. Options A, B, C and D therefore received widespread support, but with the acknowledgement that capacity may be limited. Option E also received significant support as a major opportunity for growth around the HS2 Interchange station, although may not be deliverable during the plan period. Options F and G received substantial attention from developers and local communities. A large number of sites, of varying sizes, were submitted to the Call for Sites around the existing villages and rural settlements. View from house builders and landowners that larger scale developments would be necessary to provide long-term growth, continued housing supply and required additional infrastructure improvements. Major concern from local residents centred around loss of Green Belt, detriment to rural character, congestion and under-provision of infrastructure.

Strategic Housing Market Assessment (SHMA) November 2016

23. In December 2015, the Council commissioned Peter Brett Associates to prepare an independent Strategic Housing Market Assessment for Solihull for the period 2014 and 2033, to be compliant with Para. 158 of the NPPF and the latest Planning Practice Guidance.
24. Part 1 of the SHMA aimed to provide an objective assessment of housing need (OAN) for Solihull, and Part 2 provided a breakdown of that OAN of both affordable and market housing need by mix, type and affordable tenure.
25. The 2016 SHMA established an OAN figure of 13,093 dwellings from 2014-2033. Taking into account the consistency gap with the HMA-wide Strategic Housing Needs consistency gap from 2011, and the testing of 2,000 contribution to the wider HMA shortfall, the housing land target for the Draft Local Plan was 15,029; or 791 dwellings per year.

26. The PBA SHMA 2016 Part 2 findings identified that 26.9% of the OAN should be affordable, and these should be of the tenures of shared ownership and rented (both social and affordable) to meet the identified need for affordable housing taking into account the borough's circumstances.

Draft Local Plan (2016)

27. The Draft Local Plan was consulted upon from 5 December 2016 to 17 February 2017. The DLP included 19 allocations for residential development, including a mixed use allocation at the UKC Hub around the HS2 Interchange station.
28. Policy P4a on affordable housing included a 50% affordable housing target, split 20% for Starter Homes and 30% affordable housing (65:35 social rent to shared ownership).

Interim Sustainability Appraisal of Draft Local Plan (2016)

Policy P4

29. Policy P4 performs well or neutrally against most of the nineteen sustainability objectives, with a major beneficial outcome for housing, as it sought to address objectively identified needs for market and affordable housing as well as provision of a range of housing sizes and types, self-build and custom build and housing in the rural area.
30. Minor adverse outcomes were identified associated with potential impacts of the environment, and impacts on climate change and energy theme were unclear as there lacks direct reference to sustainable construction. However, these can be mitigated by other policies in the Plan.

Policy P5

31. The Interim SA of the Draft Local Plan forecast a mostly positive outcome, in particular with regards to providing sufficient housing (SA16), improving health inequalities (SA17), prosperity (SA1) and access to jobs (SA2). The most significant negative outcome (moderate) is with regards to landscape (SA10). Indirect effects include the potential for enhancing public transport connections that would benefit the wider network and existing communities. The level of growth could have a minor negative impact in terms of greenhouse gas emissions, and the number of allocations on the edge of settlements could result in increased reliance on the private car.
32. The SA refers to the fact that no provision is made in the policy to contribute towards the historic environment or green infrastructure, but does acknowledge that other policies address these issues.

Consultation representations to the Draft Local Plan (2017)

33. The Summary of Representations to the Draft Local Plan were reported to Cabinet Member on 18th July 2017.¹ There were 1,750 respondents to the consultation, comprising over 6,300 representations.
34. Comments on Policy P4 'Meeting Housing Needs' gave general support to the policy, but that more detail on implementation would need to be provided in the policy itself and not reserved to an SPD. Concerns were raised that a Viability Assessment had not yet been carried out; policy should be more flexible; Starter Homes were no longer mandatory; should consider needs for the elderly and those with disabilities; and need for housing to remain affordable in perpetuity.

¹ <https://www.solihull.gov.uk/Portals/0/Planning/LPR/DLP - Summary of Representations.pdf>

35. Comments regarding Policy P5 centred mainly on the housing requirement. From the development industry there were views that the SHMA was conservative in its approach, in particular regarding household suppression in younger households, affordability market signals and balancing households with economic growth, and several alternative housing need assessments were submitted by consultancies. It was further expressed that Solihull should take a greater share of the wider HMA shortfall, the windfall allowance was unjustified, evidence was required for the 36dph density, phasing of supply was discouraged, and post-2033 development needs should be catered for.
36. Views from local communities were that Solihull should only meet its own housing needs, the greater housing delivery rates proposed would compromise the overall standard of living and quality of the Borough, and figures should be constrained by the Green Belt.
37. Other local authorities in the wider HMA welcomed the testing of the 2,000 contribution, however, there was a view that the contribution could be higher.

Draft Local Plan Supplementary Consultation (DLPSC) (2019)

38. A supplementary consultation was published in January 2019², which focussed on proposed housing allocations and not policies. The Draft Local Plan had consulted on red line sites in 2016 and indicated estimated capacities based on the SHELAA (2016). Following further more detailed work on site constraints and deliverability issues, concept masterplans were drawn up for the proposed housing allocations and published in a separate document as part of the consultation.
39. The consultation document used the standard methodology to assess local housing need, as introduced by the revised NPPF in July 2018. The base year of the Local Plan Review was revised to the most recent year, 2018, and extended to 2035. The Local Housing Needs figure was established as 767 dwellings per annum, or 13,039 over the 17-year period. The DLPSC continued the commitment to test a contribution of 2,000 dwellings to the wider HMA shortfall, with a surplus buffer of 726 dwellings. The overall housing requirement for the period 2018-2035 therefore stood at 15,765 dwellings.
40. An Interim SA was carried out on the housing options in the Supplementary Consultation, but did not further assess the policies.

Consultation Representations to the Draft Local Plan Supplementary Consultation (2019)

41. In response to the consultation, there was wide agreement that the Standard Methodology (SM) for assessing Local Housing Need (LHN) is the correct approach, but also that it should be regarded as the starting point and minimum figure. Further views from the development industry were the Borough should make a greater contribution to the HMA shortfall, and an uplift should be applied to the LHN to meet the Borough's employment growth over the plan period. Views from local communities were that the housing requirement was unrealistic as rates were much higher than previously achieved; it should be lowered to reduce loss of Green Belt, and more brownfield sites should be used in the HMA to meet the shortfall.

² <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Solihull-Local-Plan-Review-Draft-Concept-Materplans.pdf>

3. Housing Requirement

Introduction

42. The Draft Submission Local Plan (DSP) revises the plan period from 2018-2035 forward to 2020-2036, with expected adoption in 2021.

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (NPPF, Paragraph 60).

Local Housing Needs figure

43. The DSP follows guidance on the standard methodology in the revised NPPF (2019) and Planning Practice Guidance in establishing the Local Housing Needs (LHN) figure as a starting point for the Borough's housing requirement.
44. The LHN for the plan period 2020-2036 is 807 dwellings per annum, or 12,912 overall. Further detail on the housing needs figure calculations is provided in the SHELAA and Policy P5 in the DSP (at paragraph 220).

Housing Economic Development Need Assessment (HEDNA) (2020)

45. National planning practice guidance is clear that the LHN provides a minimum starting point in determining the number of homes needed in an area and it explains when it might be appropriate to plan for a higher housing need figure than the standard methodology indicates. This has been addressed in the HEDNA, which has considered whether the UK Central Hub proposals represent a deliverable growth strategy that is likely to exceed past trends.
46. The HEDNA concludes it is and has therefore looked to see what additional workforce may be required. On the basis that the standard methodology provides for higher jobs growth than baseline predictions indicate are necessary; and if commuter patterns for employment in the UK Central Hub area remain at 2011 census levels then a small increase to 816 dpa would be justified. Over the plan period this would result in a need for Solihull of 13,056.

Neighbourhood Plans

47. Paragraph 65 of the NPPF states:

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations³⁰. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

48. The schedule below outlines the housing requirement for each of the designated Neighbourhood Areas in the Borough. This figure comprises the amount of housing

expected to be delivered through site allocations (made in this plan) in each Neighbourhood Area along with sites identified in land availability assessments, those identified in the Councils BLR and site allocations in the Solihull Local Plan 2013 without planning permission at 1st April 2020.

- Balsall 402
- Berkswell 1,356
- Cheswick Green 1,002
- Dickens Heath 650
- Hampton in Arden 1,012
- Hockley Heath 141
- Knowle, Dorridge & Bentley Heath 808
- Meriden 100

4. Housing Supply

Call for Sites Submissions

49. A 'Call for Sites' exercise was first undertaken in parallel to the Scope, Issues and Options consultation from December 2015 to February 2016. Landowners or developers or others wishing to promote a site were invited to suggest sites that may be available for development.
50. 247 sites were put forward through this exercise and these were considered in more detail as the draft plan was prepared and included in the 2016 Strategy Housing and Economic Land Availability Assessment produced by PBA.
51. During May 2016 and July 2017, a further 47 sites were submitted (numbered 300-346) and published alongside the summary of representations to the Local Plan.³ 24 further sites were submitted up to 2018 (numbered 400-426), and were included with the preceding sites in the Site Assessments Document⁴ at the time of the Supplementary Consultation to the Draft Local Plan. Finally, 55 further sites were submitted up to April 2020 (numbered 500-564). These, and all previous sites, have been included in the Draft SHELAA Update (2020)⁵ and the revised Site Assessments Document accompanying the Draft Submission version of the Local Plan.
52. The vast majority of the sites (and resulting capacity) put forward are located in the Green Belt.

Brownfield Land Register

53. In 2017 Brownfield Land Register (BLR) regulations were introduced which require each LPA to publish a BLR identifying previously developed land (PDL) which is suitable, available and achievable for residential development.
54. Given that the Council needs to demonstrate "exceptional circumstances" if land is to be taken out of the Green Belt, it is necessary to identify all possible land supply that may be available through this source. With this in mind the Council pursued two non-statutory stages in producing a BLR as follows:
 - A dedicated 'call for sites' exercise aimed at PDL. (July 2017)
 - The publication of a draft BLR register for consultation. A copy of which can be found [here](#).
55. By undertaking these additional steps, as well as updating the BLR on an annual basis, the Council has ensured that it has a robust position on the potential land supply from brownfield land.

DSP Housing Supply

56. Suitable sources to include in the deliverable supply of housing are sites with planning permissions, Local Plan allocations, a windfall allowance, and other sources of land supply such as the SHELAA and Brownfield Land Register, as applicable.
57. The monitoring of new dwellings is reported on an annual basis to Government, and the year runs from 1st April to 31st March.

³ [https://www.solihull.gov.uk/Portals/0/Planning/LPR/Call for Sites Schedule July 2017.pdf](https://www.solihull.gov.uk/Portals/0/Planning/LPR/Call%20for%20Sites%20Schedule%20July%202017.pdf)

⁴ <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Draft-Local-Plan-Supplementary-Consultation-Site-Assessments.pdf>

⁵ <https://www.solihull.gov.uk/Portals/0/Planning/LPR/Draft-SHELAA-Update-2020.pdf>

58. A summary of the Housing supply for the Draft Submission Local Plan is provided below.

Source	Capacity
1 Sites with planning permission (started) ⁶	1,663
2 Sites with planning permission (not started) ⁷	1,119
3 Sites identified in land availability assessments ⁸	320
4 Sites identified in the brownfield land register (BLR)	77
5 Town Centre Sites ⁹	961
6 Solihull Local Plan (2013) allocations without planning permission at 1 st April 2020	350
7 Less a 10% to sites with planning permission (not started), sites identified in land availability assessments, BLR and SLP sites	-283
8 Windfall housing land supply (2022-2036)	2,800
9 UK Central Hub Area to 2036	2,740
10 Allocated Sites to 2036	5,270
Total Estimated Capacity (rows 1-10)	15,017

Small Sites

59. The NPPF (Para. 68) includes a requirement that 10% of a Local Plan's housing requirement is accommodated on sites up to 1ha in size. This requirement is aimed at promoting the development of a good mix of sites and recognising that small and medium size sites build out more quickly.
60. Of the known supply (Rows 1-6 above), 1,162 dwellings are on sites of up to 1ha in size. A further 340 dwellings would be required to meet the 10% small sites requirement, or less than 40 dwellings a year from the windfall supply. Records show that in the past 5 years at least 100 dwellings have been completed per annum on small windfall sites in the Borough. Therefore, it is reasonable to expect that the remainder of small sites will come forward on windfall sites.

Windfall

61. Windfall sites constantly come forward in Solihull and make a significant contribution towards housing land supply. The nature of the Borough provides continuous opportunities for the redevelopment and recycling of land. High land values and existing low-density

⁶ Full dwellings and communal combined.

⁷ As above

⁸ Including sites that would become available if the Green Belt boundary changed.

⁹ Solihull Town Centre (861) & Chelmsley Wood Town Centre (100)

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- development areas provide the incentive to recycle land and ensure redevelopment is viable.
62. The Council has always been selective in permitting windfall development, only granting planning permission that preserves and enhancing local character and distinctiveness. The currently adopted Local Plan has been successful in supporting windfall housing development in sustainable locations, and the proposed Draft Submission Version continues to include provision for windfall.
63. The reliability of windfall sites can be tested through the history of windfall sites coming forward. There is compelling evidence that windfall sites consistently become available in Solihull. The windfall assumption in the adopted Solihull Local Plan was 150 dpa. The average windfall supply since 1992 has increased to 208 dpa and in the last decade is 251 dpa. The 5YLS position adopted at Cabinet in July 2019 set out a revised windfall rate of 200 dpa to reflect his position. To prevent double-counting with existing permissions, the windfall completions are counted from the third year of supply, therefore from 2022 onwards.

5. Housing need by mix, type and tenure

Introduction

64. The Council recognises the importance of creating sustainable, inclusive and mixed communities in all areas, both urban and rural. Solihull has a high level of affordable housing need and the Council is committed to helping local people who cannot afford to buy or rent homes on the open market. There is a need to not only improve the affordability of housing across the Borough but also contribute to a range of outcomes including an improved mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.
65. The Council's approach is in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

Housing Needs Assessments (SHMA 2016 and HEDNA 2020)

66. The PBA SHMA (Strategic Housing Market Assessment) 2016 Part 2 findings identify that of the 14,268 dwellings, 3,831 need to be affordable (26.9%) and these should be of the tenures of shared ownership and rented (both social and affordable) to meet the identified need for affordable housing taking into account the borough's circumstances.
67. The conclusions of the SHMA is that this proportion of new housing as affordable is achievable in Solihull and can be met within the OAN identified by the PBA SHMA study 2016 and no adjustment is required to this figure.
68. Solihull Council commissioned a HEDNA (Housing and Economic Development Needs Assessment), to take into account the revised 2019 NPPF, updated PPG and introduction of the standard methodology.

Breaking down the Borough's housing needs (Solihull HEDNA 2020)

69. The HEDNA assesses the borough's affordable housing needs in section 7 of the report. The analysis shows that there is a need for 578¹⁰ dwellings per annum between 2020 and 2036.
70. In analysing the need for affordable homeownership products, the HEDNA identifies that the key issues are access to capital for deposits as well as mortgage restrictions, as opposed to the overall cost to buy housing. Therefore the study recommends the Council seeks 10% of housing as shared ownership.
71. The HEDNA notes that the provision of new affordable housing is an important and pressing issue in the Borough. However the HEDNA report advises that the need for 578 affordable dwellings is not an "affordable housing target. The amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise" (*Affordable Housing Need: Key Points and Recommendations*, Page 120).
72. For example the HEDNA looks at data from the Department of Work and Pensions (DWP) and has used this to look at the number of Housing Benefit supported private rented homes. "As of March 2020, it is estimated that there were over 3,500 benefit claimants in the private rented sector in the study area (Housing Benefit and Universal Credit with a housing entitlement). From this it is clear that the PRS contributes to the wider delivery of 'affordable homes' with the support of benefit claims and further complicates any attempts to find a relationship between affordable need and overall housing need" (Paragraph 7.71).

¹⁰ This reduces to 224 if households already in accommodation are excluded.

73. Solihull Council also maximises the affordable housing through various means:
- Solihull Local Plan (2013) Policy P4a requiring qualifying sites provide 40% affordable housing.
 - Building 100% affordable housing on sites on Council owned land through the Council's Arm's Length Management Organisation, Solihull Community Housing.
 - Enabling work with Registered Providers to support them to directly develop 100% affordable housing sites.
 - Purchasing open market housing using the 'one for one replacement' from right to buy receipts.
 - Utilising the private rented sector to meet housing needs through a leasing scheme and a tenant matching scheme 'Solihome'
<https://www.solihullcommunityhousing.org.uk/work-with-us/private-landlords/>
 - Making best use of the Council's social rented housing through the Housing Allocation Scheme and operation of 'movement incentives'
 - Homelessness prevention and reduction initiatives, helping to deliver the Councils Homelessness and Rough Sleeping Strategy.

Affordable Housing Policy and Threshold

74. Planning can assist those in priority housing need through the provision of affordable housing. This policy is required to ensure provision reflects local Borough demand and helps to sustain mixed and balanced communities. A sustainable, mixed and balanced community will include a mix of;
- Tenures
 - Housing to support households with a range of incomes;
 - Housing type and size to allow residents to move within the area as their housing needs change; and
 - Sufficient range and choice to accommodate households at various lifecycle changes.
75. Policy P4A seeks to maximise the provision of affordable housing to contribute towards meeting borough-wide needs. Policy P4A seeks to secure an appropriate mix on a site-by-site basis, having regard to:
- Site size;
 - Accessibility to local services and facilities and access to public transport;
 - The economics of provision, including particular costs that may threaten the viability of the site;
 - Whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site;
 - The need to secure a range of house types and sizes in the locality in helping to achieve socially balanced and mixed communities; and
 - Vacant Building Credit
76. The Council faces local constraints to meeting affordable housing need in the Borough. This takes the form of the:

- High level of affordable housing need
 - Level of need in relation to the overall housing provision target
 - Proportion of development that has taken place, and will continue to take place, on small unidentified sites
77. Taking into account the NPPF affordable housing threshold, the Council thinks that the proposed percentage target of 40% of dwellings is appropriate to Solihull's local circumstances. This percentage requirement takes into account the requirement to meet the Borough's affordable housing needs.
78. The Council's approach to the provision of housing land seeks to maximise the use of previously developed land within the urban area. Small windfall sites which are emerging through the restructuring of the urban areas from the redevelopment of existing residential areas to higher densities for housing land supply have provided a significant amount of housing and this is expected to continue.
79. A 40% affordable housing target and a 0.5 ha/15 and above dwelling threshold was adopted by the Council and subsequently upheld following the UDP First Review Public Inquiry in 2006. The UDP site size threshold (15 homes or 0.5 hectare) below which there was no requirement to provide affordable housing led to many sites which could reasonably have provided affordable homes being fully developed with market housing.
80. Following viability testing, Policy 4(a) in the adopted Solihull Local Plan in 2013 set a lower threshold at which an affordable housing contribution is required, of 0.2 hectares or more or delivering 3 or more net dwelling units. This target maximised the provision of affordable housing that can be delivered by the planning system without threatening the viability of sites or deterring private residential development. This was fully supported by the Inspector's report.
81. On the 19 May 2016 Government announced changes to national planning guidance in respect of the thresholds at which affordable housing contributions may be sought. This follows the order of the Court of Appeal dated 11 May 2016, which gave legal effect to the policy set out in the Written Ministerial Statement of 28 November 2014. The new guidance states at paragraph 31 that:
- "contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm"*
82. NPPF in 2019 introduced a new national minimum threshold for affordable housing obligations in Planning Policy Guidance. The revised threshold in the Draft Submission Plan is consistent with this.
83. The Council's proposed target in the Draft Submission Local Plan aims to maximise the provision of affordable housing that can be delivered by the planning system without threatening the viability of sites or deterring private residential development. The Council has demonstrated a flexible approach in the implementation of adopted Policy P4(a) and remains committed to considering the suitability of sites and the amount of affordable housing through negotiation and on a site by site basis. The Council thinks that the proposed percentage target and threshold is appropriate to Solihull's local circumstances. The 40% of dwellings target is supported through the Council's Local Plan viability report which looks at all the burdens upon development through policies in the Draft Submission Local Plan and concludes they are viable and would still incentivise sites being brought forward.

84. The Draft Local Plan Supplementary Consultation sought views and comments on changing affordable housing contributions on qualifying sites to 40% of habitable development area from percentage of units. This could either be on-site square meterage (sqm), or based on habitable floorspace or habitable rooms. Habitable space refers to bedrooms, cooking, eating and living areas.
85. The Supplementary Local Plan documentation set out that moving from a percentage calculated on unit numbers will incentivise developers to build more smaller homes and therefore increased numbers of open market houses (also increasing density). This would also support the Council to deliver more affordable housing.
86. The aim the Council set out was that the Council wanted to see more first time buyer homes and smaller homes and was keen to incentivise this through the affordable housing policy.
87. The Council received 28 objections to the proposal, 8 supporting it and 25 statements commenting on it. The principal objections can be broken down into three areas; conflict with NPPF, conflict with housing need; and impact on viability.
88. NPPF sets out separate requirements for affordable housing and density. The affordable housing policy is set to meet the identified needs for affordable housing. In Solihull this has been done using a 40% of dwellings approach. This policy is also set on a borough wide basis.
89. NPPF is also makes clear the plans must have policies for density. It shares the purpose that developments ensure optimal use of land, however it also states that should be on a range that is suitable to each site. The Draft Submission Local Plan sets density policy through the development of masterplans for each allocation.
90. The Solihull HEDNA is an important part of the evidence base for the emerging Local Plan. It is a 'policy-off' document in that it robustly sets out needs, but it is for the Council to make policy judgements about how these are best met.
91. As update evidence, this housing mix by size has been incorporated into the Draft Submission Local Plan policy thus giving a policy weight to the mix that ought to be achieved on a site. This will help drive the provision of smaller house types.
92. It should be noted that the introduction of First Homes, as consulted on by the government and response approved by The Cabinet Member in April 2020, may have an impact on the tenure of the affordable sought.
93. The Council's Strategic Housing Land Advisors, Cushman and Wakefield have been appointed to provide on-going viability advice to support the Local Plan Review. This has been an iterative process as sites/policy requirements are updated to reflect other emerging evidence/policy demands. The final version of the viability evidence supports the current 40% of dwellings on site.
94. The 2006 UDP, 2013 SLP and 2016 DLP policy expressed the affordable housing requirement as a proportion of dwellings (40%). The Authority Monitoring Report showed that the policy has been effective. It should also be noted that the consultation responses although identified material objections, also support for the current policy "Support the retention of the unit housing measurement as a clearly understood basis given the system is already required to meet housing size, mix and accommodation standards set down by the local authority".
95. The authority has therefore decided that a 40% of dwellings affordable housing requirement is most appropriate for meeting its needs and the boroughs circumstances.

96. Policy P4A will apply to development in the 'C3' use class and also 'C2' developments that provide self-contained accommodation. If the development is considered unsuitable for on-site affordable housing provision the Council will negotiate a commuted sum so as to meet the need off site. Care developments not providing self-contained accommodation will not trigger an affordable obligation under P4A.

Social and Affordable Rent

97. The HEDNA identifies that 16% of households can afford an affordable rent but this does not automatically lead to a policy conclusion on the split between the two types of rented housing. For example, many households who will need to access rented accommodation will be benefit dependent and as such could technically afford an affordable rent (as long as the full rent is covered by Housing Benefit) and hence a higher proportion of affordable rented housing might be appropriate. Providing more social rented housing might enable households to return to work more easily, as a lower income would potentially be needed to afford the lower social (rather than affordable) rent. Finally, in considering a split between social and affordable rented housing it needs to be considered that having different tenures on the same site (at least at initial occupation) may be difficult – essentially if tenants of the same home are paying a different rent for the same property and services.

Shared Ownership

98. In analysing the need for affordable homeownership products, the HEDNA key issues are access to capital for deposits as well as mortgage restrictions as opposed to the overall cost to buy housing. Therefore the report recommends the Council seeks 10% of housing as shared ownership due to lower deposit requirements.
99. The Council is committed to meeting housing needs and has a well-established policy position developed from the 2013 Solihull Local Plan of requiring qualifying sites to provide 65% social rented housing and 35% shared ownership as part of the overall 40 affordable housing obligations. The increased provision of shared ownership allows more households to either move out of rented housing and gives more choice for them to live in an area they have support, education or work needs. The feedback from registered provider is also that this is good mix for the new communities.

Starter Homes, discounted market sales housing and other affordable routes to home ownership

100. The Housing and Planning Act 2016 places a new duty on all local planning authorities to promote the supply of Starter Homes in their area. Starter Homes are exclusively for first time buyers under the age of 40, for sale at least 20 per cent below normal market prices. The price cap is set as £250,000 outside Greater London.
101. The Act also allows Government to set Regulations requiring Starter Homes to be included on residential sites as a condition of securing planning permission. These Regulations have not yet been issued and the Council will approve its position on Starter Homes once these are known.

First Homes

102. The Government conducted a consultation on First Homes in February 2020. This highlighted that a 30% discount off market price should be the minimum level of discount under this scheme. The First Homes would be a compulsory requirement of the affordable housing obligation on any qualifying scheme.

103. On 6 August Government announced that First Homes will be introduced and confirmed that these will be sold at a discount of at least 30%. When the home is sold, the discount will always be passed onto the new owner with the discount applied to the new value. Revised national planning guidance will require that a minimum of 25% of all affordable housing secured through developer contributions should be First Homes.
104. If and when introduced, in Solihull the First Homes requirement under Policy P4A will be in place of the shared ownership units first, with the remaining obligation to all be social rented homes.
105. Further detail on First Homes is to be confirmed by Government. This is expected to follow from decisions taken on the consultation 'Changes to the current planning system' (August 2020).
106. First Homes are not a part of this Local Plan as under transitional arrangements Government has said that local plans submitted for Examination within 6 months of the policy being enacted will not need to reflect First Homes policy requirements.
107. The below table from the HEDNA sets out a suggested estimated open market value (OMV) and the level of discount likely to be required to achieve affordability. For 1 and 2 bedroom this is 20% on a borough wide basis. For 3 and 4 bedroom homes a discount of 30% is required to make them affordable. It should be noted that these calculations are based on a specific set of data for prices and rents for the borough and the HEDNA recommends any individual scheme proposing discounted market housing would need to be tested to ensure that it is reasonably affordable in a local context.

HEDNA 2020 - Table Affordable home ownership prices – data for year to September 2019 – Solihull Borough

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£108,000	£131,000	18%
2-bedrooms	£151,000	£191,000	21%
3-bedrooms	£189,000	£262,000	28%
4+-bedrooms	£290,000	£415,000	30%

Build to Rent

108. 'Build to Rent' is defined by the National Planning Policy Framework and National Planning Policy Guidance. It can be an important part of meeting Solihull's housing requirements, supporting the local economy and enabling people to remain within a locality for the long-term. The 2020 HEDNA recognises that the private rented sector can meet some of the Borough's identified housing needs.
109. The NPPG is clear that Build to Rent is a distinct asset class within the private rented sector. Applications for Build to Rent that meet the criteria set out in paragraphs 003 – 011 of the NPPG shall be required to make an affordable housing contribution of 20% in accordance with paragraph 002. This will be expressed as Affordable Private Rent as defined by NPPF and NPPG. Where necessary, viability assessments will be done on a site specific basis to determine the affordable housing requirement if necessary.

Rural Exceptions

110. The Rural Housing Policy P4B is an enabling policy for local communities. Therefore it is important that the proposal meets either of the below criteria as per the policy in the adopted Solihull Local Plan:

b) Rural Exceptions

The provision of affordable housing developments on green belt land to meet the local needs of households in that Parish or neighbourhood will be supported in circumstances where,

- i. The development proposal is consistent with the Village, Parish or Neighbourhood Plan; or
- ii. There is evidence that people with a local connection to the Parish area have a housing need that cannot be met through affordable housing provision on an allocated housing site and the proposed development is supported by the Parish Council or Neighbourhood Group.

111. In order that Parish Council's and Neighbourhood Forums have confidence in the policy it is important that their support is vital if any proposal is taken forward. The tenure, type and bedroom size of units should also be agreed with the Parish Council or Neighbourhood Plan, therefore moving away from the usual bedroom sizes would be acceptable as long as the proposed type and bedroom size of the properties is supported by the Parish Council or Neighbourhood Plan.

112. The policy is justified by the acknowledged role that providing homes for local people in these Parishes or Neighbourhoods Plan areas has in supporting communities and maintaining the vitality of rural settlements through retaining population which supports local services and facilities.

113. Policy P4B is an enabling policy for Parish Council's and Neighbourhood Areas to meet their own needs and support the vitality of villages and their services and facilities.

Exception Sites

114. Paragraph 71 of NPPF says that local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area. The Council will support these in accordance with the latest NPPF and PPG at the time of decision making.

Market Housing

115. The Council is justified in requiring the mix of market housing to reflect the types of households requiring it so that market provision reflects local Borough demand and promotes and sustains mixed and balanced communities.

116. The Borough-wide appropriate mix of market housing is set out below,
Estimated Size of Market Housing Requirement in Solihull (HEDNA 2020)

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Market Housing	0-10%	20-30%	45-55%	15-25%

- 117. This is a Borough-wide assessment. A similar mix of housing in all areas is expected but this will be applied flexibly according to specific local characteristics (including neighbourhood plans that may set out a mix for their area). In applying the mix to individual development sites, regard will be given to the size and nature of the site and character of the area, up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.
- 118. Specific sites, such as town centre development, may result in a different mix of housing being delivered.
- 119. Based on the evidence, it is expected that the focus of new market housing provision will be on 2- and 3-bed properties. Continued demand for family housing can be expected from newly forming households. Some demand for medium-sized properties (2- and 3-beds) from older households downsizing can also be expected.
- 120. The Council will monitor what is being built to ensure that a reasonable mix of market housing is provided across the Borough.
- 121. In applying this policy, any room designated as a bedroom should comply with the criteria set out in the national space standards.

Self and Custom Housebuilding

- 122. The Self-build and Custom Housebuilding Act obtained Royal Assent in March 2015.
- 123. The Secretary of State has enacted Regulations that state from 1 April 2016 the provisions made under the Self-build and Custom Housebuilding Act 2015 will come into force. Solihull MBC is required under the Act to keep a Register (referred to as self-build and custom housebuilding register) of all individuals and associations of individuals who are seeking to acquire serviced plots of land in Solihull and who wish to build homes for themselves to occupy as their main residence.
- 124. The Council has a duty to have due regard to this register when carrying out our housing, planning and land disposal functions.
- 125. The Housing and Planning Act received Royal Assent in May 2016 and introduces a concept of ‘Right to Build’. This Act is taking forward the requirements of the Self-build and Custom Housebuilding Act 2015 further, requiring local planning authorities to support those registered on Self-build and Custom Housebuilding Registers by identifying enough suitable plots of land to meet local demand through their Local Plan.
- 126. The Council is justified in making provision for self and custom build housing in order to comply with the Self and Custom Housebuilding Act, the Housing and Planning Act, National Planning Policy Guidance and the needs on the self-build register.
- 127. The Self and Custom Housebuilding Register was established in Solihull in March 2016.
- 128. The Draft Submission Local Plan requires developers of allocated sites to make a contribution to Self and Custom Build Housing on residential sites of 100 units or more.

Contributions will be expected to be made in the form of 5% of open market dwellings in the form of Self and Custom Build Plots on each development site.

129. The Council expects these plots to be offered for sale with outline planning permission, services to the boundary and access to the highway for period of 12 months to those registered on Solihull's Self and Custom Build Housing Register. The value of the plots will be subject to an independent valuation by a registered surveyor.
130. The mechanisms and criteria for delivery of Policy P4D will be set out in a revised Meeting Housing Needs Supplementary Planning Document.

Housing for Older and Disabled People

131. National planning policy requires local planning authorities to plan for the needs of different groups in the community, including older people and those with disabilities.
132. Understanding and meeting the housing needs of particular groups is an important part of the Council's duties under the Equality Act 2010, including the Public Sector Equality Duty.
133. Consultation responses to the 2016 Draft Local Plan supported specific local plan provision for older people and those with disabilities.
134. Neighbourhood Plans are also supportive of a range of housing being provided for older people and those with disabilities.
135. The Neighbourhood Plans that have been 'made' at Hampton-in-Arden, Berkswell and Knowle, Dorridge and Bentley Heath all identify the requirements to provide housing for older people,
 - Hampton-in-Arden – Policy HOU1: 'smaller properties suitable for those seeking to downsize'; 'properties suitable for the elderly'
 - Berkswell – Policy B1.5: 'A suitable mix of housing should be provided...for older people and those with disabilities'
 - Knowle, Dorridge and Bentley Heath – Policy H3: 'The provision of specialist housing....sheltered housing for older people..'
136. The Neighbourhood Plan for Balsall has been agreed and will proceed to referendum. This includes Policy H6: 'Bungalows for downsizing by older residents'; Policy H7: Specialist accommodation for extra care, residential and nursing and dementia'.
137. The Meriden Submission Draft Neighbourhood Development Plan has been consulted upon and will progress to independent Examination. The Plan recognises the need to '..provide opportunities to provide more movement in local housing markets to enable older people to downsize or move to different types of housing', and 'the provision of housing that is adaptable to changing circumstances and physical requirements' (Submission draft paragraph 5.4.6).
138. The growth in the number of older persons' households is a key feature in the population and household change which is expected to occur in the period to 2036. During the Local Plan period 31% of the overall population growth (7,147 persons) is projected to be aged 75 and over, at which point it will represent 12% of all the Borough's households.

Table Projected Change in Solihull's Population of Older Persons, 2020 to 2036

	2020	2036	Change in population	% change
Under 65	171,446	183,609	12,162	7.1%
65-74	23,091	27,150	4,060	17.6%
75-84	15,622	19,121	3,499	22.4%
85+	6,889	10,537	3,648	53.0%
Total	217,047	240,417	23,369	10.8%
Total 65+	45,601	56,808	11,207	24.6%
Total 75+	22,510	29,657	7,147	31.8%

Source: HEDNA 2020

139. In addition, more people will have disabilities during the Plan period. Applying prevalence rates from PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information) to estimates of population growth linked to the Standard Method, provides an indication of the scale of this.

Table Projected Changes to Solihull Population with a Range of Disabilities

Disability	Age Range	2020	2036	Change	% Change
Dementia	65+	3,379	4,545	1,166	34.5%
Mobility problems	65+	8,713	11,377	2,664	30.6%
Autistic Spectrum Disorders	18-64	1,219	1,302	83	6.8%
	65+	418	529	111	26.5%
Learning Disabilities	15-64	3,214	3,440	226	7.0%
	65+	948	1,174	226	23.8%
Challenging behaviour	15-64	59	63	4	6.8%
Impaired mobility	16-64	7,170	7,349	179	2.5%

Source: HEDNA 2020 using POPPI/PANSI and Demographic Projections

140. There will be an overlap between these categories (some people will have both dementia and mobility problems, for example) and so the numbers for each of the illnesses/disabilities cannot be added together to arrive at a total.
141. Dementia does not just affect older people, however there are significant increases in the number of older people with dementia (increasing by 34.5% from 2020 to 2036) and mobility problems (30.6% increase over the same period). There is no clear evidence identifying the best method of providing dementia care or accommodation, and it is likely that a range of solutions will need to develop in the plan period.
142. Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population.
143. It is important that all older people and younger adults with disabilities have good and affordable housing choices. This requires that housing preferences and needs are

understood when establishing the types and tenure of housing required for older people and others with disabilities.

Adult Social Care - Solihull Council Approach

144. National and local data suggests that many older people wish to stay in their existing home, or at least remain in their neighbourhood.
145. The Council has approved a Market Position Statement (MPS) for Adult Social Care (2019), which is periodically reviewed and updated. This sets out the needs, care and support provision in the Borough and the Council's commissioning intentions in respect of older people and younger adults with learning disabilities, autistic spectrum conditions, mental health and physical disabilities and sensory impairments.
146. The MPS recognises that prevention and early intervention is an effective approach to supporting communities and enabling older people to live independently in their own homes for longer without the need for formal care services.
147. The Council has also approved 'Our Offer to You' which sets out the Council's approach to its 2014 Care Act obligations and how residents care needs will be served.
148. The MPS and 'Our Offer to You', along with other adult social care policies and strategies are available at www.solihull.gov.uk/About-the-Council/Strategies-policies/socialcare .
149. 'Our Offer to You' states that 'We aim to ensure you are supported to live a full and independent life in your local community'. This is being achieved through:
 - Providing a wide range of information and advice – through 'Community Advice Hubs' and the Council's web site on matters such as home repairs and adaptations and keeping warm and safe (<https://solihull.mylifeportal.co.uk/livingathome/>)
 - Helping people stay independent or regain independence – through advice on equipment, adaptations and other gadgets. The Council has a 'Better Living Centre' which is open to the public and helps people to see the range of equipment and support that is available. The Council also provides a short-term 'reablement' service to encourage, build confidence, help regain self-care skills and give tailored help to enable people to remain as independent as possible following an illness, an operation
 - Communities and local support - working with individuals and communities, including special interest groups, faith groups, voluntary organisations and others to build local support networks, to make the most of community resources, and to identify and support people who are isolated or at risk of harm
 - Ensuring a variety of accommodation options are available – working with different providers to help ensure that a variety of accommodation options and services are available in the community, should a person need to move to more appropriate accommodation for their needs such as extra care.
150. The Council believes that social care investment in community-based approaches is effective. Such provision avoids premature intervention (which removes natural support structures and creates dependency) and over provision (which creates long-term dependency by reducing independence).
151. This approach requires that older people need good housing options and are able to make informed decisions about them. An important option is to enable people to receive care and support in their existing home.

152. Disabled Facilities Grants are an important element supporting independent living. Disabled and minor works carried out each year are important in helping people aged 65 and over live well at home.
153. The 'Safe and Sound' service provided by Solihull Community Housing (a wholly owned 'arm's length' Council company) also supports this. 'Safe and Sound' currently provides services to over 1,100 elderly private residents, 55% of whom are aged 76 years and above.
154. The Joint Strategic Needs Assessment (JSNA) recognises the importance of adaptive and assistive technology and telecare in helping people to remain in their own homes for longer. Administrative records from the Council's Adult Social Care Directorate show that there are an increasing number of complex packages of care that are managed in the community and more than 1,600 older people use assistive technology to help enable independent living. The Council thinks that the opportunities technology offers to enhance independence can be developed much further.

General Needs, Accessible and Adaptable Dwellings and housing with support

155. Not all older people therefore have a need for specialist accommodation. Needs can, and are, met in a variety of ways influenced by a range of factors including the availability of family support, domiciliary care and personal choice. Through additional suitable general needs housing (including bungalows), grants for disabled adaptations, increased capacity in 'reablement' and use of assistive technology, the Council aims to improve outcomes for older people.
156. Following on from this, an important part of meeting need for older people, and those with disabilities, will be through general purpose new homes built to accessible standards and which are suitable and attractive for 'downsizing'. This will include 'age-restricted general market housing' designed for people aged 55 and over and the active elderly which may include some shared amenities such as communal gardens but does not include support or care services.
157. The Parliamentary Select Committee 'Housing for Older People' report referred to 'downsizing' as 'rightsizing', noting the wider social advantages in older people moving to a smaller home that better suits their needs (<https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/37008.htm>).
158. Developers are therefore encouraged to think creatively and innovatively about the type of home that would be attractive for this part of the housing market. A number of research publications have looked in detail at this in recent years, for example 'Designing with Downsizers' (<https://www.housinglin.org.uk/Topics/type/Designing-with-Downsizers-The-next-generation-of-downsizer-homes-for-an-active-third-age/>)
159. Government has consolidated a wide range of housing standards. This is based on minimum Building Regulations requirements (M4(1)) with the ability for local planning authorities to apply the optional national standards over and above these (M4(2) and M4(3)). One of the optional standards covers accessibility.
160. Building regulations define three categories of dwellings (2015 edition of Approved Document M: Volume 1 (Access to and use of dwellings)):
 - M4(1) Category 1 – 'Visitable'. Mandatory. The current baseline default for all new homes unless optional access standards are applied. This does not guarantee ease of access for disabled people, particularly wheelchair users

- M4(2) Category 2 – ‘Accessible and Adaptable’ (nearest equivalent to ‘Lifetime Homes’ standard).
 - M4(3) Category 3 – ‘Wheelchair User Dwellings’, split into two sub-types:
 1. Category 3 2a – ‘Wheelchair adaptable’ (providing space and layout features, but not fully fitted out), and
 2. Category 3 2b – ‘Wheelchair accessible’ (ready and fitted to accommodate a wheelchair user household).
161. The M4(2) standard promotes the ability of people to remain in their homes as their circumstances change as it covers design measures that can allow homes to be adapted. This point gains added weight given that minor works can be very effective in promoting independence. The English House Condition Survey found that the most common adaptations required were inside the home and relatively simple to install. The four most common were a grab hand rail inside the dwelling, bathing aids, specialist toilet seat and a shower.
162. Requiring M4(2) compliant homes is an important step towards ‘homes for life’ that are suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation. This effectively complements the Council’s social care approach, described above.
163. With regard to M4(3), PPG (56-009) states that ‘Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling’. Policies for market housing can require delivery of wheelchair-adaptable dwellings, this being a home that is constructed to be adjustable for occupation by a wheelchair user, M4 3 2a.
164. PPG (63-009) states that where an identified need exists, local plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing. Optional standards can only apply where a policy is included in a Local Plan. Policy P4E therefore applies the accessibility standards in Solihull.
165. The HEDNA (2020) demonstrated the need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. The evidence supports a policy requirement that,
- all dwellings (in all tenures) meet the M4(2) standards
 - a need for 700 dwellings to be for wheelchair users
166. The Viability Study to support the Local Plan concluded that Policy P4E is viable.
167. The requirements for wheelchair housing have been set at a level that would allow Solihull to meet its expected requirement. The need for wheelchair user housing is expected to grow with an ageing population, and this has been factored into the requirements.
168. Where application of the 5% requirement results in a fraction of a wheelchair user dwelling, provision will be rounded to the nearest whole dwelling. For instance, 5% of a 235 dwelling development would be 11.75, which should result in provision of 12 homes.
169. Direct development by the Council or a Registered Provider will aim to provide M4(2) or M4(3) in all new development. Where the Council is developing directly, or has nomination rights, M4(3) is likely to be wheelchair accessible dwellings constructed for immediate occupation (M4 3 2b) and/or M4 3 2a). This recognises that Registered Providers may

already build to higher standards, and that households in the affordable sector are more likely to have some form of disability. This will be assessed on a site by site basis.

170. Retirement living, or housing with support, provides purpose-built homes with limited communal facilities. It does not provide care services but may include a house manager and alarm assistance. Developments of this nature have consistently come forward in the Borough on small brownfield sites.

Specialist Housing and Care Homes

171. In addition to providing more general housing that is suitable for older people, Local Plan policy needs to proactively support the provision of specialist housing and care bed provision.
172. Different terms are used for specialist housing that can provide a medium to high level of care through a Care Quality Commission (CQC) registered agency. The descriptions used for these developments include 'housing with care', 'extra care', 'assisted living', 'continuing care retirement communities', or 'retirement villages'.
173. The Housing LIN (Fact Sheets 1 and 12) discuss the nature of extra care housing. The essential point is that it provides purpose-built, accessible design that promotes independent living and supports people to 'age in place'.
174. The core aspects identified by the Housing LIN include,
- Fully self-contained properties where occupants have their own front doors and tenancies or leases which give them security of tenure and the right to control who enters their home
 - Communal spaces and facilities
 - Access to personal care and support 24 hours a day through an agency registered with the CQC
 - Community alarms and other assistive technologies
 - Office for use by staff serving the scheme.
175. Specialist schemes of this nature will therefore provide self-contained homes to residents who may need care at the time that they take up occupation, or may develop a need for care over a period. Schemes will usually endeavour to maintain a balance between people with relatively high care needs and people with lower needs in order to enable informal community support.
176. All housing with care developed in Solihull must be built to M4 2, 3 2a or 2b requirements of the Building Regulations, Approved Document M, Volume 1. People moving into such housing are more likely to be wheelchair users or have mobility problems. It is important to recognise that as individual household circumstances change, some households will start using a wheelchair whilst living in specialist housing if their health deteriorates.
177. Care Homes by contrast have individual rooms ('care bedspaces') within a residential building and provide a high level of care meeting all activities of daily living. Personal care and accommodation are provided together as a package with no clear separation between the two. This type of provision includes residential, nursing and dementia care. Care homes will be CQC regulated for the purpose of 'accommodation for persons who require nursing or personal care'.

Need for Specialist Housing and Care Homes to 2036

178. There is no standard methodology for assessing the need for housing with care and care homes. The current and future demand for elderly care is influenced by a host of factors including the balance between demand and supply in any given area and social, political, regulatory and financial issues.
179. While there are no definitive rates, Paragraph 4 of the PGG (Para 63-004) states: “The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people.”
180. The Housing LIN produced the Strategic Housing for Older People Resource Pack (SHOP) in 2013. This was developed as a guide to assist public bodies in estimating need for different types of housing and accommodation suited to older people. The toolkit indicates the ratio of required units per 1,000 of the population aged 75 years and above. The original SHOP 2014 rates were reviewed in 2016.
181. The SHOP rates provide one part of the overall evidence base for assessing future need for housing accommodation for older people. The toolkit acknowledges that the suggested levels of provision are inter-related and may need to be moderated. For example, promoting extra care as an alternative to residential care will influence the relative balance of need.
182. The Council's social care commissioners report that the Covid-19 pandemic has resulted in lower demand for care home places and of spare capacity in existing homes. It is unclear whether this will be a short-term consequence or whether it signals the start of a longer-term trend. The Council will monitor this.
183. Another uncertainty in the care home sector is that of existing workforce pressures and the potential for these to be exacerbated by Brexit in 2021 and later years.
184. The Council will develop an Accommodation Strategy for older people and younger adults with disabilities which will include a statement of need that reflects the Council's adult social care approach.
185. The following table shows the additional requirement for housing with care to 2036.

Table Housing with Care Need using adjusted SHOP@ Assumptions, 2020-36 (constant prevalence rates) – Solihull

Type	Housing demand per 1,000		Current Supply	Current Demand	Current Shortfall	Additional Demand to 2036	Shortfall by 2036
Housing with Care	Market	27	461	598	137	190	327
	Affordable	17	361	382	21	121	142
Total		44	822	980	158	311	469

Source: HEDNA 2020

186. There are 112 housing with care market dwellings currently consented, or in development which are not included in these figures.
187. This needs analysis is based on a rounded provision rate of 4.4% to the population aged 75 and is discussed in further detail in the HEDNA. The use of this rate reflects 2008 Housing LIN rates, and the 2016 Review. Account has also been taken that the health of older people in Solihull is better than nationally, Local Plan policy to provide more general needs housing suitable for older people and social care policies to support independent living.
188. The affordability of additional provision is important. Some of this need will be from owner-occupiers in low-value or poor condition housing and may require some form of shared equity product. Some older people with low levels of equity will not necessarily be able to afford new housing and some will want or need to release equity on moving.
189. The need figure set out here is considered to be the minimum level of housing with care that needs to be delivered in the period to 2036.
190. The Council will monitor delivery on an annual basis and this will be reported in the Authority Monitoring Report.
191. While some provision housing with care may be provided through windfall sites, the likely size of site required means that this is considered too uncertain to rely on. It is also recognised that developers of housing with care can struggle to secure sites in competition with general house builders. Policy P4E therefore requires that allocated sites of 300 dwellings or more make provision for specialist housing or care bedspaces.

Residential, Nursing and Dementia Care

192. The nature of care homes is discussed in paragraphs # – # above.
193. The need for residential and nursing care bedspaces in the period to 2036 is set out in Table # below. The rate applied is consistent with the 2016 Housing LIN Review. Although the methodology is different, it is comparable to the measure of need in LaingBuisson Age Standardised Demand model.

Table Residential and Nursing Care Need using adjusted SHOP@ Assumptions, 2020-36 (constant prevalence rates) – Solihull

Type	Housing demand per 1,000	Current Supply	Current Demand	Current shortfall	Additional Demand to 2036	Shortfall 2036
Residential Care Bedspaces	44*	880	980	100	311	411
Nursing Care Bedspaces	44*	667	980	313	311	624
Total Bedspaces	87	1,547	1,960	413	622	1,035

*The prevalence rate applied is 43.5. Source: HEDNA 2020.

194. It is important to note that the above needs analysis is fee neutral and some care will need to be provided at local authority rates.
195. There are 296 residential and nursing bedspaces currently consented, or in development which are not included in these figures.
196. Solihull's rate of permanent admissions to care homes is one of the lowest in the West Midlands which is partly due to the development of extra care housing capacity and partly as a result of the community services that have been commissioned.
197. This national prevalence rate is likely to be high in the Solihull context given the Council's social care policies, described above. The proportion of older people requiring residential care may also slowly reduce as extra-care provision increases.
198. The need figure set out here is considered to be the maximum level of residential and nursing care that needs to be delivered in the period to 2036.
199. The Council will monitor delivery on an annual basis and this will be reported in the Authority Monitoring Report.
200. Developers of new care homes typically seek sites offering between 0.5 and 0.8 hectares to allow for two storeys of accommodation, appropriate staff/visitor car parking provision and sufficient gardens to allow residents access to good levels of external space.
201. Recent care home development in Solihull has averaged between 70-80 care beds and 'windfall' sites have been an important part of this supply. Of the 577 additional care beds approved and or built between 2017 and 2020, 38% were on 'windfall' sites.

Younger Adults with Disabilities

202. Care and support is also required by people who do not fall in to the older people category but have needs arising from, for example, physical disabilities, learning disabilities and mental health issues. Larger sites can make a contribution to meeting these needs.
203. The population growth among adults aged 18-64 with disabilities is less pronounced than among older people. For adults aged 18-64, the Council will work to develop affordable accommodation options and alternatives to residential care and it is this rather than increases in actual numbers which will provide the main pressure point for meeting these housing needs.
204. The Council works with social care commissioners to identify the needs for additional development. This is likely to be comparatively small scale affordable rented provision developed on Council brownfield 'windfall' sites, or form part of the affordable housing requirement on larger allocated Local Plan sites. The policy requirement to build general housing to Category 2 and 3 is also an important part of meeting the housing needs of this group.

Planning Use Classes

205. Use classes are defined in the Town and Country Planning (Use Classes) Order 1987. Use Class C2: Residential Institutions is defined as "use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 (dwelling houses)." C3 (dwelling houses) are defined as "use as a dwelling house (whether or not as a sole or main residence) a) by a single person or by people living together as a family;

or b) by no more than 6 residents living together as a single household (including a household where care is provided for residents).”

206. As more flexible models of domiciliary care have emerged, the distinction between the C2 and C3 use classes has become less clear. This is particularly the case where care provision, or the amount of care, is the determining factor.

207. Planning Practice Guidance on Housing for Older and Disabled People was published in June 2019. In respect of Use Classes, Para 63-014 states that:

“It is for a local planning authority to consider into which use class a particular development may fall. When determining whether a development for specialist housing for older people falls within C2 (Residential Institutions) or C3 (Dwelling house) of the Use Classes Order, consideration could, for example, be given to the level of care and scale of communal facilities provided.”

208. The Council's approach on care levels and communal facilities will be that,

- Occupation must be restricted to people (at least one within a household) in need of personal care, with an obligation for such residents to subscribe to a minimum care package of 2 hours per week through an onsite care agency registered through the CQC. Personal care is defined in Regulations as “the provision of personal care for persons who, by reasons of old age, illness or disability are unable to provide it for themselves, and which is provided in a place where those persons are living at the time the care is provided.” (Schedule 1 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014).
- Provision of access to a range of communal areas and facilities, typically beyond that of simply a communal lounge, with the access to these facilities typically reflected in the service charge.

6. Gypsies and Travellers

Introduction

209. Gypsies and Travellers in England have some of the worst outcomes of any group across a range of social indicators. It is well recognised that they are amongst the most socially excluded groups in society and research has consistently confirmed the link between the lack of good quality sites for Gypsies and Travellers and poor health and education. Accommodation issues contribute to many of the inequalities that Gypsy and Traveller communities experience, and are frequently a source of tensions between travelling and settled communities. The Government and the Council acknowledge that these inequalities and tensions must be addressed, but it is crucial to ensure that the planning system is not abused and that development is located in the most appropriate locations.
210. One of the key challenges identified in the draft Submission Local Plan is to maintain supply of Gypsy and Traveller sites and pitches to ensure that the identified accommodation needs of this community in Solihull continue to be met.

Planning Policy

211. As outlined in the August 2015 update of Planning Policy for Traveller Sites (PPTS), the Government's overarching aim is to "ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community". Together with the NPPF, the PPTS sets out how local planning authorities should plan for the future accommodation needs of Gypsies and Travellers in their area.
212. The PPTS states that local planning authorities should make their own assessment of need for the purposes of planning in order to plan positively and manage development. A robust evidence base should be used to establish accommodation needs to inform the preparation of local plans and make planning decisions. Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of Travellers in their area. The PPTS recognises that sites should be sustainable economically, socially and environmentally and that fair criteria should be set to guide land supply allocations and provide a basis for determining planning applications.
213. Gypsies and Travellers are defined in the PPTS as:
- 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such'.*
214. The Council is required to specifically and separately address the future accommodation needs of Travellers who meet the PPTS planning definition of a Traveller over the plan period.
215. However, for those Gypsies and Travellers who do not lead a nomadic lifestyle (i.e. those that have ceased to travel permanently and do not therefore meet the PPTS planning definition), there remains a requirement for the Council to continue to assess and plan for their needs as part of its wider responsibilities to meet the accommodation needs of its settled community. Additionally, the Human Rights Act 1998 and the Equalities Act 2010

protect the cultural choice of Gypsies and Travellers to live in mobile accommodation. The Council should therefore provide culturally suitable choices.

Development of Policy P6 'Provision of Accommodation for Gypsies and Travellers'

216. Policy P6 of the Draft Submission Local Plan outlines the Council's approach to the provision of accommodation for Gypsies and Travellers over the period 2020 to 2036. It builds on the Council's previous approach as set out in the 2013 Solihull Local Plan. This was based on evidence from the 2012 GTAA which was also used to prepare a Site Allocations Document adopted in December 2014
217. Consequently, in the first round of consultation on the Local Plan Review in November 2015 (Scope, Issues and Options consultation), Policy P6 was identified as a policy that required no change and could be rolled forward in its existing form. This was because the evidence to support the policy was still up to date and the Gypsy and Traveller Site Allocations Plan had been adopted for less than a year.
218. Whilst there were no significant objections to this approach amongst the consultation responses, it was highlighted that since the 2013 Local Plan and Gypsy and Traveller Site Allocations Plan had been adopted, the PPTS had been updated. The Council therefore committed to consider whether there was any justification to amend Policy P6.
219. In December 2016 the Council consulted on a Draft Local Plan. Policy P6 was amended slightly to reflect the fact that the DPD had been adopted and that many of the allocated pitches had been granted planning permission. The Council considered that being less than 5 years old, the evidence base in the 2012 GTAA was still up to date and that a 5 year supply of pitches could be demonstrated. As such, Policy P6 sought to retain the criteria that would be used in the allocation of future sites, should additional pitches, or a review of the Site Allocations Plan be required.
220. The representations that were received included support for the policy as it addressed the accommodation needs of Gypsies and Travellers. Other comments suggested the need for additional criteria which should be used in the determination of planning applications, not just the allocation of future sites. Reference was also made to the requirement to assess future need through robust local evidence.
221. Whilst an additional 'Supplementary Consultation' took place on the Local Plan Review in January 2019, this focussed predominately on housing need and sites, rather than policies.
222. Therefore, in preparation for the Draft Submission Plan and given the passage of time between publication of the Scope, Issues and Options consultation in 2015 and the Supplementary Consultation in 2019, it was considered necessary to revisit Policy P6 to ensure it was still fit for purpose.
223. Having regard to the PPTS requirement to use a robust evidence base to establish accommodation needs, together with a growing recognition that the 2012 GTAA was coming to the end of its life, it was considered necessary to update the evidence base to support the preparation of Policy P6 of the Draft Submission Local Plan.

Evidence and the Policy Approach

224. In October 2019 the Council commissioned Opinion Research Services Ltd (ORS) to update the GTAA in order to identify the future accommodation requirements of Gypsies and Travellers in Solihull over the period 2020 – 2036 and inform Policy P6 of the Local Plan Review.

225. At the time of writing, the 2020 GTAA is currently in the process of being completed. However, the Covid-19 pandemic has had a severe impact on the completion of the household interviews that are required to support this work and at the time of publishing the Draft Submission Plan, the 2020 GTAA has not yet been finalised. Notwithstanding this, the GTAA is assessing the needs of all Gypsies and Travellers in the Borough, including those who meet the planning definition of a Gypsy or Traveller and those who do not. The GTAA will also include an assessment of need for any households that it is not possible to interview – this is referred to as undetermined need and the GTAA will include recommendations on how this need should be addressed.
226. Historically, the Council has demonstrated a positive and proactive approach to making sure that the needs of the Gypsy and Traveller community have been met, and it will continue to do so. In 2014, the Council adopted a Gypsy and Traveller Site Allocations Plan to address the pitch requirements as set out in the previous 2012 GTAA. The Site Allocations Plan allocates sites to meet the identified need of 38 permanent residential pitches between 2012 and 2027, in full. Whilst most of the allocated sites and pitches now have planning permission, there are 8 pitches on identified site allocations that have not yet come forward through the planning application process. These sites / pitches were originally phased to come forward post 2017 to ensure provision later in the plan period and to secure the longer term need for sites.
227. The Draft Submission Policy P6 commits that the Council will seek to meet the need for any permanent residential pitches to 2036 that is identified in the updated GTAA. This will include meeting the needs arising from Gypsies and Travellers who meet the PPTS planning definition of a Traveller, as well as those who have ceased to travel permanently.
228. The accommodation needs of travelling Gypsies and Travellers who meet the PPTS definition will be met through the remaining sites allocations in the 2014 Site Allocations Plan and any unimplemented planning permissions / undeveloped pitches on allocated sites. Emerging analysis also suggests that any additional immediate need may be accommodated through the intensification of use within the boundaries of existing authorised sites. In accordance with the PPTS, the policy therefore sets out clear criteria that will be used in the determination of planning applications to intensify existing authorised Gypsy and Traveller Sites that contribute to meeting any need that may be identified in the forthcoming 2020 GTAA.
229. Where required, the Council will undertake an update of its Gypsy and Traveller Site Allocations Plan. Consistent with the PPTS, the policy sets out the criteria that will be used to guide the allocation of future sites.
230. In accordance with the NPPF and to ensure the Council meets its public sector equality duty, Policy P6 also seeks to ensure that there are culturally suitable choices to meet the identified accommodation needs of those Gypsies and Travellers who have ceased to travel permanently and do not meet the PPTS planning definition. Proposals for new sites or pitches, and applications for the intensification of existing sites will also be assessed against the criteria in the policy.
231. This section of the topic paper will be updated when the 2020 GTAA has been completed.

7. Other Groups

Students

232. There are no higher education establishments in Solihull and no significant term-time student population. The Local Plan makes no specific provision for this group.

Service Families

233. Solihull Council is a signatory to the Armed Forces Covenant and is committed to meeting the aims of the covenant through its policies and practices.
234. The position of service personnel has been considered but as there is no Ministry of Defence presence within Solihull the Local Plan therefore makes no specific provision for this group.

8. 'Meeting Housing Needs' SPD Review

235. The Council adopted the Meeting Housing Needs SPD in July 2014 following a period of consultation.
236. The Local Plan Review, together with forthcoming significant changes in legislation and national planning guidance, makes a review of this SPD necessary. The Council will prepare a revised SPD for consultation. This will revise and update the existing SPD, and provide additional guidance on policies P4A-P4E.