



Solihull
METROPOLITAN
BOROUGH COUNCIL



***SUPPLEMENTARY
PLANNING GUIDANCE***

**AFFORDABLE
HOUSING**



Adopted May 2003



Preface

At its meeting on 7th October 2002, the Planning and Regulatory Committee approved a draft version of this document for publication. The consultation was carried out during November and December 2002 and a list of consultees is provided in the appendix.

The results of the consultation were reported back to the Planning and Regulatory Committee on 17th March 2003 where the SPG was approved for publication subject to referral to the Cabinet Member for formal approval of Policy. The document was then formally approved on 20th May and adopted on 28th May 2003.

Supplementary Planning Guidance

AFFORDABLE HOUSING

Adopted 28th May 2003

Contents

	1 Introduction	4
	2 Aims	5
	3 Policy Framework	5
	3.1 Solihull Unitary Development Plan (UDP) – Adopted April 1997	5
	3.2 Planning Policy Guidance (PPG) Note 3 – Housing (PPG3) (March 2000)	5
	3.3 Circular 6/98: Planning and Affordable Housing – (April 1998)	5
	3.4 Regional Planning Guidance for the West Midlands (RPG11) – (1998)	5
	3.5 Solihull Unitary Development Plan First Review 1998-2011	6
	3.6 Local Housing Needs Assessment	6
	4 The Definition of Affordable Housing	7
	5 Evidence of Housing Need in Solihull	9
	6 Site Suitability	10
	6.2 Site size and dwelling numbers	10
	6.3 Access to public transport and proximity of local services and facilities	10
	6.4 Exceptional development costs and other planning objectives	11
	7 Affordable Housing Requirements	12
	8 Negotiations	14
	9 Planning Obligations	14
	10 Options for Provision of Affordable Housing	15
	10.2 On site	15
	10.3 Off site	15
	10.4 Cash in lieu (commuted sum)	16
	10.5 Using housing associations	16
	11 Design	18
	12 Monitoring and Review	18
	13 Council Contacts	18
	Appendix - Consultation	19

FORWARD PLANNING
PLANNING SERVICES GROUP
Solihull Metropolitan Borough Council
Council House, P.O. Box 18, Solihull,
West Midlands, B91 3QS
telephone 0121 704 6000 fax 0121 704 6404
e mail: ForwardPlans@Solihull.gov.uk
www.solihull.gov.uk

Maps reproduced from the Ordnance Survey Map with the permission of the Controller of Her Majesty's Stationary Office.
Crown Copyright reserved. Licence No. LA 076333.

Supplementary Planning Guidance

As part of the review of the Unitary Development Plan, Solihull Council has updated its policy on affordable housing. The results of a comprehensive Borough wide housing needs survey in 2001, regional planning guidance (RPG11) and central government policy guidance (Planning Policy Guidance Note 3 - Housing) have all been taken into account in this review. As part of this review process the Council has produced Supplementary Planning Guidance (SPG) on affordable housing to supplement and assist with the implementation of the affordable housing policy in Solihull.

This SPG brings together all the relevant matters on the subject of affordable housing to provide clear, consistent and comprehensive advice and guidance to those submitting planning applications which are likely to attract affordable housing. In particular it will enable developers to be aware of the Council's expectations at an early stage in the planning process.


The 2001 housing needs survey produced detailed information on housing need, household incomes and housing costs across the Council's area, and followed the methodology set out in the Government's good practice guide "Local Housing Needs Assessment."

In line with government policy guidance, the Council has used the survey data to analyse local household income levels and housing costs for dwellings of varying sizes. The affordable benchmark is that a household should not spend more than 30% of its net household income on rent and/or mortgage payments.

Affordable housing is defined in detail within this guidance although in general terms affordable housing can be regarded as 'Housing provided for local people at a cost that those in housing need, as defined by the Office of the Deputy Prime Minister, can afford. Taking the balance of incomes and housing costs into account, the Council considers that rented and shared ownership housing, provided through a housing association, are likely to be the most effective forms of affordable housing provision in Solihull. However, the Council will give consideration to other approaches, such as dwellings with a permanent open market discount, where the housing costs are within the maximum affordable shown in Table 1.

The Council will follow government guidance as laid down in circular 6/98 when assessing the suitability of sites for affordable housing. Site suitability will therefore be determined by:

- its size
- existing provision of affordable housing and local housing need in the area
- the proximity of local services and facilities and access to public transport
- 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
- the need to achieve a successful housing development.



Given the extent of housing need in the Borough, and the nature of the development sites that are projected to become available to 2011, the Council intends an affordable target of 40% on sites of more than 15 dwellings or over 0.5 hectare. The target will be a Borough wide one reflecting the widespread distribution of housing need and the need to take advantage of the housing opportunities that become available.

A developer may consider that where there are exceptional or abnormal development costs, in addition to an affordable housing requirement, the economic viability will be threatened. In such circumstances, the Council will expect the developer to submit a viability analysis countersigned by an independent valuer. In general, however, the Council will expect that such abnormal costs will have been reflected in the initial land purchase price.

The Council's overall objective is to maintain an overall flow of housing development making it possible for affordable housing opportunities to come forward. The proposed policy on affordable housing recognises practical complexities of individual sites. The Council will therefore adopt a flexible approach having regard to such factors as site circumstances and the nature of the local residential area. Similarly, while the SPG outlines indicative details of affordable provision in terms of dwelling size and the split between rent and shared equity provision, these details can be expected to vary from site to site.

Where a landowner or developer is planning a new residential development, early contact should be made with the Council to negotiate the affordable housing requirement. In all cases where an affordable requirement is negotiated, the Council will enter into a Section 106 Agreement with the landowner or developer.

The Council is committed to achieving mixed and balanced communities in line with wider planning objectives. Consistent with PPG3, the Council will always start from the presumption that the affordable requirement will be provided on site as part of the wider development. Only in exceptional circumstances will the Council consider the affordable requirement to be met off-site or through the negotiation of a financial contribution. The mechanism for calculating the financial contribution is laid out within this guidance.

1 Introduction

- 1.1** Government policy, as laid down in PPG12 (Development Plans), acknowledges the valuable role that supplementary planning guidance (SPG) can play in supplementing the policies and proposals of the Development Plan. Government advice also indicates that SPG may be taken into account as a material consideration in the assessment of development proposals.
- 1.2** In response to Government guidance this supplementary planning guidance has been produced by Solihull Council to provide additional information to assist with the implementation of affordable housing policy. The Council is strongly committed to encouraging the provision of affordable housing to meet housing needs in the Borough. The Community Strategy for Solihull gives importance to meeting housing needs in the borough through the provision of affordable housing and this is further developed in both the Council's Housing Strategy and the Council's Unitary Development Plan.
- 1.3** The Council has carried out a Housing Needs Survey, which has informed both the Council's Housing Strategy (2002-2005) and the Unitary Development Plan First Review, which will guide development in the Borough up to 2011.
- 1.4** The Council will make use of its powers to seek affordable housing to help satisfy its local housing needs. This will involve negotiating for an element of affordable housing on suitable development sites with the Council's negotiating position being set out within this SPG.
- 1.5** This Guidance will provide further detailed information on how the Council intends to implement its affordable housing policy in practice and will enable developers to be aware of the Council's expectations at an early stage in the development process.
- 1.6** The Council recognises that a reasonable and flexible approach is required, reflecting individual site characteristics. However, the Council considers that it is important and helpful to be as clear as possible over its approach on all of the key issues.
- 1.7** The contents of this guidance will be taken into account as a material planning consideration in determining planning applications.

2 Aims

- 2.1 The aims of this SPG are to improve the delivery and maximise the opportunities available for the provision of affordable housing to help meet the housing needs in the Borough and to provide a mechanism for securing affordable housing in response to Government guidance. This guidance also aims to reduce uncertainty, ensure a consistent approach and provide clear guidance for developers to follow in the provision of affordable housing.

3 Policy Framework

3.1 **Solihull Unitary Development Plan (UDP) – Adopted April 1997**

- 3.1.1 The UDP is the statutory land use plan for Solihull, which contains policy on affordable housing (Policy H5) whereby the Council would seek to achieve the provision of affordable housing within the Borough by generally negotiating for an element of affordable housing on suitable strategic and windfall sites where development would be of a substantial scale.

3.2 **Planning Policy Guidance Note 3 – Housing (PPG3) (March 2000)**

- 3.2.1 Since the adoption of the UDP, Government guidance in the form of PPG3 has been issued updating guidance relating to affordable housing. This states that a community's need for affordable housing is a material consideration, which should be taken into account in formulating development plan policies and in deciding planning applications involving housing.

3.3 **Circular 6/98: Planning and Affordable Housing – (April 1998)**

- 3.3.1 PPG3 is supplemented by Circular 6/98, which sets out in more detail the Government's approach to affordable housing. It aims to provide a clearer framework for preparing plan policies and practical advice to local authorities on how they should encourage the supply of affordable housing in appropriate circumstances through negotiation with developers and others.

3.4 **Regional Planning Guidance for the West Midlands (RPG11) (1998)**

- 3.4.1 RPG 11 encourages the provision of a mix of house types and sizes from existing stock and new provision to cater for the needs of all sections of the community. Access to housing for those in greatest need is considered of particular importance.
- 3.4.2 Guidance states that affordable housing consists of both subsidised housing and low cost market housing which is available to people who cannot afford to occupy housing on the open market.
- 3.4.3 RPG is currently under review. The Draft Guidance provides a clear definition of affordable housing and all aspects of the draft affordable housing policy is expected to be carried forward into development plans.

3 Policy Framework

3.5 Solihull Unitary Development Plan First Review 1998-2011

- 3.5.1 The Solihull UDP is currently under review and will update the Council's current policy on affordable housing. Affordable housing policy in the review has been prepared in the context of the Council's Housing Strategy (2002-2005) and has taken full account of the Housing Needs Survey 2001, PPG3 and Circular 6/98.
- 3.5.2 This SPG takes full account of and is consistent with Government guidance, in particular, the advice given within PPG3 and Circular 6/98, the Council's Housing Strategy and the Housing Needs Survey 2001. SPG is based on and provides supplementary information to existing and emerging plan policies in the Council's adopted UDP and the UDP Review.
- 3.5.3 The commitment to the provision of affordable housing and the needs identified in Solihull is reflected in the recent appeal decision for Wimpey Homes v Solihull MBC (September 2002) where the Secretary of State indicated that the "identified need for affordable housing in Solihull is such that each strategic site should make an appropriate contribution" and "given the policy context of PPG3, the Secretary of State also agrees that larger identified windfall sites coming forward will be required to make a contribution to identified needs."

3.6 Local Housing Needs Assessment

- 3.6.1 In July 2000 the Department of Transport, Local Government and the Regions (DTLR), now the Office of the Deputy Prime Minister (ODPM) issued 'Local Housing Needs Assessment: A Guide to Good Practice'. This set out an 18 stage 'basic needs assessment model' for determining the overall surplus or shortage of affordable dwellings in a local area. The Council's Housing Needs Survey which underpins its emerging policy on affordable housing followed the methodology set out in this guide.

4 The Definition of Affordable Housing

- 4.1** The Council follows Government guidance set out in PPG3 and Circular 6/98. This defines affordable housing as that which is available to people who cannot afford to rent or buy houses generally available on the open market (Circular 6/98, Paragraph 4).
- 4.2** The Council recognises that there are two broad types of affordable housing:
- Social housing provided on the basis of need. The Council's expectation is that this provision will be rented dwellings normally provided by a Registered Social Landlord.
 - Low cost market housing. The Council uses this term to refer to provision that helps households purchase an equity share in a property. Affordable provision in this context is targeted at the needs of first time buyers, single people, the elderly and other low income households who cannot afford to rent or buy houses generally available on the open market (PPG3, para. 13; Circular 6/98 para. 9a).
- 4.3** In line with Circular 6/98, the Council has defined what it considers affordable in its Plan area (PPG3, para. 12) having regard to local income levels and housing costs for dwellings of varying types.
- 4.4** The Council defines affordable housing, irrespective of tenure, as: 'Housing provided for local people at a cost that those in housing need, as defined by the ODPM, can afford.
- 4.5** On the basis of the 2001 Housing Needs Survey, calculations of the maximum affordable cost of housing in the Borough have been made. The affordable cost figures shown in Table 1 are based on no more than 30% of net household income being spent on housing.

Affordability and housing costs

Proportion of households in need who are unable to afford at costs above those indicated	WEEKLY AFFORDABLE COST OF HOUSING		
	1 bedroom	2 bedrooms	3+ bedrooms
100%	£78	£95	£111
90%	£67	£81	£95
80%	£56	£67	£79
70%	£44	£54	£63
60%	£33	£40	£47
50%	£22	£26	£31
40%	£11	£13	£15

Notes:

1. In the table, the percentages are cumulative. So, for example, 100% of households in housing need and requiring a one-bedroom dwelling cannot afford more than £78 a week, 90% cannot afford more than £67 a week.
2. The monetary values originate from the Housing Needs Survey. Data on housing costs and incomes for households of different sizes were obtained before applying the rule that no more than 30% of net household income is spent on housing.
3. Weekly housing costs in excess of those shown in the 100% row would not be affordable.

- 4.6 The Council will update this data on an annual basis.
- 4.7 In the light of the definition of affordable housing the Council has assessed the different forms of provision as follows,
- Affordable housing for rent. This is characterised at below market rents, which are usually paid weekly; the dwelling is secured on a permanent basis and is provided to those in housing need. The Council considers that the majority housing need is for rental dwellings. The Council is particularly concerned that rental levels do not exacerbate the 'poverty trap' and allow households on low incomes to take up, or remain in, gainful employment.
 - Low Cost Market Housing. This is for people whose incomes are not sufficient to buy or rent in the open market but who can afford to buy an equity share of housing, or purchase at a discounted price.
- 4.8 The Council considers that shared ownership provides the best form of affordable provision in the low cost market context. Shared ownership is used to refer to housing that is partly sold and partly rented. In most cases a housing association will act as the landlord. The housing association would have first option on any resale so that the affordability benefits are enjoyed beyond the first occupier. In cases where the shared ownership purchaser increases their share of ownership to 100%, the Council will seek the agreement of the housing association to reinvest the money in Solihull for the purposes of affordable housing.
- 4.9 Forms of low cost market housing (discounted in perpetuity, self – build, resale covenant and other fixed equity schemes, for example) other than shared ownership will be considered.
- 4.10 Housing provided at a discount by the developer to the first occupier only is unlikely to constitute a suitable form of affordable housing. To be affordable, it would need to be demonstrated that the accommodation would be priced below the current average price paid by first time buyers in the Borough for properties of a corresponding size in similar areas. The Council considers that this form of provision also fails to retain affordable accommodation 'in perpetuity'. The Council will therefore wish to negotiate other forms of affordable housing which will achieve this objective.
- 4.11 In circumstances where there is a legal agreement concerning a dwelling being affordable in perpetuity, this requirement will be removed where it can be shown that there is no longer a requirement for the dwelling to be affordable.
- 4.12 In all cases, the affordable solution proposed will primarily be judged against the weekly affordable costs (or an updated version thereof) quoted in Table 1.
- 4.13 The Council is committed to the fact that affordable housing must not mean substandard housing, either in terms of space or standards.

5 Evidence of Housing Need in Solihull

- 5.1 Demand for housing in the Borough is strong. Most areas have a buoyant housing market in both the sale and rental sectors, reflecting the growing local economy and the attractiveness of the Borough as a residential area in the wider West Midlands region. Data from sources such as the Land Registry, the Halifax quarterly price survey and the Council's own consultations with estate agents in the Borough, confirm that house prices have risen steeply in recent years. This is in relation to both average incomes and house prices elsewhere in the region.
- 5.2 All sections of the community experience these demand pressures but they are most keenly felt by those currently in housing need and those least able to compete financially in the housing market. The Council has a developed picture of housing need primarily on the basis of an externally commissioned needs survey. Information from homelessness records, the Housing Register and data from housing associations has been used to refine and complement the needs survey.
- 5.3 The Council's definition of housing need follows that set out by the Department of Transport, Local Government and the Regions (DTLR), now the Office of the Deputy Prime Minister (ODPM) 'Local Housing Needs Assessment' (2000) as 'households lacking their own housing or living in housing which is inadequate or unsuitable, who are unlikely to be able to meet their needs in the housing market without some assistance' (Appendix 2, p116).
- 5.4 The Council's Housing Needs Survey was completed in 2001 and provided a 5 year projection of housing needs. This survey was based on 1,502 household interviews and 2,744 postal questionnaire returns, representative by tenure and area.
- 5.5 The survey method followed that set out by the Department of Transport, Local Government and the Regions (DTLR) in 2000 and showed backlog need, newly arising need and the anticipated supply of affordable dwellings through turnover and new provision. The survey concluded that there was an annual shortfall of 631 affordable dwellings per year in the period to 2011. The findings and recommendations of the 2001 Housing Needs Survey have been formally endorsed by the Council.
- 5.6 The Council's Housing Register provides an insight into housing need in the Borough. The Register is regularly reviewed to ensure it is up to date. The Council's Housing Register shows that there are over 3,000 households registered for Council accommodation. The average length of time on the Housing Register, at 31 March 2002 was 115 weeks compared to 93 weeks one year earlier.
- 5.7 Housing need is also apparent through the households who approach the Council as homeless, or threatened with homelessness. Each year the Council deals with some 1,100 enquiries with over 600 being assessed as having a need for housing assistance.

6 Site Suitability

6.1 PPG3 refers to individual site suitability, whilst Circular 6/98 defines the criteria that should be taken into account in assessing the suitability of sites. For the purposes of this guidance and to be consistent with Government guidance, the suitability of each individual site will be determined by:

- its size
- existing provision of affordable housing and local housing need in the area
- the proximity of local services and facilities and access to public transport
- 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
- the need to achieve a successful housing development

6.1.1 These may affect the level of affordable housing that is sought or may make it inappropriate to seek any affordable housing on a particular site.

6.1.2 These factors now form part of the UDP Review Policy on affordable housing (Policy H4).

6.2 Site size and dwelling numbers

6.2.1 The Council's 1997 adopted UDP Affordable Housing Policy referred to negotiating for an element of such housing on sites where development would be of a substantial scale (i.e. above 40 dwellings or 1.5 hectares). The 2001 Housing Needs Survey recommended, in view of exceptional local constraints, a threshold of 15+ dwellings which was endorsed by the Council and embodied in the Housing Strategy 2002-2005 and the Solihull UDP Review (1998-2011).

6.2.2 Government guidance has consistently reduced the threshold for the size of schemes where affordable housing may be sought. In the most recent Government Circular (6/98) this threshold has been reduced to 25 or more dwellings or sites of 1 hectare or more, or above 15 dwellings and 0.5 hectares where exceptional local constraints can be demonstrated.

6.2.3 Local circumstances, as informed by the Council's recent housing needs survey suggests that the application of the higher threshold of 25 dwellings would remove a large number of sites from consideration and would reduce significantly the level of affordable housing provision secured through the planning system. A policy with a higher size site threshold would mean that the affordable housing policy objectives would not be achieved.

6.2.4 As indicated in the Council's UDP Review, therefore, the Council will negotiate for an element of affordable housing on all appropriate allocated and windfall sites in schemes of over 15 dwellings or more than 0.5 hectares in accordance with PPG 3 and Circular 6/98. The threshold will be progressed through the emerging UDP Review.

6.2.5 The Council is of the opinion that this threshold reflects the development characteristics of the Borough whereby many of the sites coming forward are a redevelopment of small residential sites.

6.3 **Access to public transport and proximity of local services and facilities**

6.3.1 Sites that are close to town or local centres and have good access to public transport are well suited to certain types of affordable housing, particularly where the provision is for non-car owning households and the elderly. The proximity to services, facilities and access to good public transport will be taken into account in deciding upon the level and type of affordable housing.

6.4 **Exceptional development costs and other planning objectives**

6.4.1 The ability to provide affordable houses may be affected by 'particular' costs associated with the site. Where the developer can prove legitimate abnormal development constraints exist, the Council in deciding upon the level of affordable housing will take this into account. Development constraints could include contamination and land reclamation works, overall site preparation costs particularly on brownfield sites.

6.4.2 Should the affordable housing requirement be considered to threaten the economic viability of a development, the developer will be required to submit a confidential viability analysis countersigned by an independent valuer. The Council would expect to reduce the level of affordable housing in proportion to the level of extra ordinary costs. Normally, however, the Council's expectation would be that abnormal development costs would already have been reflected in the land purchase price paid by the developer.

6.4.3 Where other planning or policy objectives or benefits make the provision of affordable housing undesirable on a site, it would normally be expected that either provision would be made on an alternative site or a financial contribution would be made toward provision elsewhere.

7 Affordable Housing Requirement

- 7.1 Consistent with PPG3 (para. 10) the Council is committed to creating mixed and inclusive communities offering a choice of housing.
- 7.2 The Council's objective is to maintain an overall flow of housing development making it possible for affordable housing opportunities to come forward on sites.
- 7.3 The level of housing need exposed by the 2001 Housing Needs Survey has required the Council to reassess its policy on affordable housing.
- 7.4 The Council's analysis concludes that a percentage target for affordable housing of 30% on sites of 25 or more dwellings would provide approximately 627 affordable dwellings in the entire period to 2011. This compares to a shortfall of 631 affordable dwellings a year
- 7.5 The Council's affordable housing policy is set on a borough wide rather than a site by site basis. The principal reason for this is that the Council has a Borough wide responsibility. Housing needs cannot always be met exactly where they arise, appropriate use has to be made of the opportunities that become available.
- 7.6 It was decided that, in the light of this, the Council should adopt a Borough wide affordable housing target of 40% on sites of more than 15 dwellings or over 0.5 hectare. This requirement produces a significantly higher level of affordable housing but would still deliver less than 15% of the projected need to 2011.
- 7.7 The affordable housing requirement will be subject to discussion on a site by site basis, having regard to the overall Borough wide target. The Council will adopt a flexible approach taking into account such aspects as local needs, the nature of the local residential area and site characteristics.
- 7.8 PPG3 places importance on the efficient use of land and proposals that use land inefficiently will therefore be refused. In this context the Council will judge development proposals for a site in the light of what is capable of being developed.
- 7.9 Borough wide, the Council's assessment of the split of affordable provision by tenure type is:

Form of provision	% of affordable provision
Rent	60 - 75%
Shared equity	40 - 25%

7.10 The implementation of Policy H4 in the UDP Review will not always require a diversity of tenures on all sites as local needs may require a concentration on one form of tenure.

7.11 Households requiring affordable housing are as diverse in their characteristics as the general population. At a Borough level, the Council's assessment of the required size mix of affordable dwellings is as follows:

1 bed flat	2 bed flat/house	3 bed house	4+ bed house
30%	33%	32%	5%

7.12 In relation to the tenure and size mix of affordable housing, it must be emphasised that these are Borough wide assessments and that specific sites may achieve quite different proportions.

7.13 The Council may require that an element of the affordable provision on a site is for special needs accommodation. In some cases, funding through Social Housing Grant (or some other means) will be available to assist in the provision of this.

7.14 In meeting the 40% affordable housing target on suitable sites the Council accepts that individual sites will bring forward differing proportions of affordable housing e.g., some sites will be developed solely by a housing association and others where having considered all the site suitability criteria the 40% target will not be achieved.

7.15 On some sites the Council may want to achieve a more specific objective eg where the affordable housing might be developed for a special needs purpose. Reflecting the different economies of provision the affordable housing requirement might be consequently reduced in such circumstances.

7.16 The Council will always endeavour to maximise the level of affordable housing on any suitable site.

8 Negotiations

- 8.1 The Council's policy on affordable housing places an obligation on a landowner and/or developer of a site to consider how a scheme may provide an element of affordable housing prior to the sale or acquisition of a site, and to contribute to its provision through offering the land at a discounted price, and/or a reduction in the cost of developing the affordable housing.
- 8.2 Negotiations on affordable housing should preferably take place prior to the submission of a planning application and will involve defining the appropriate provision including the appropriate mix, number, type, and location and, where relevant, sources of funding for social housing.
- 8.3 The initial approach should be made to the Planning Services Group where the Development Control Officer will co-ordinate the process leading towards the eventual approval of the planning application and the affordable housing contribution.
- 8.4 In implementing the affordable housing policy, the Council will seek to ensure there is close consultation between planning and housing officers and other agencies concerned with the operation of this policy such as housing associations and the Housing Corporation.
- 8.5 On the larger sites, the Council will normally prepare a development brief, in consultation with the landowner or developer, incorporating guidance on the amount and type of affordable housing.

9 Planning Obligations

- 9.1 Where affordable housing provision is sought as part of a proposed development, the Council will use a Section 106 agreement with the developer or landowner to secure the agreed provision either on site, or in exceptional circumstances off site or through a financial or other appropriate contribution.
- 9.2 The Council will ensure that the agreement is executed before the granting of planning permission.
- 9.3 The Section 106 Agreement may include clauses setting out requirements with regard to:
- the housing mix, type and number of affordable units
 - the location and distribution of affordable housing within the site
 - the timing of construction and occupation in relation to the whole site
 - the mechanisms to ensure the initial and subsequent occupancy of the affordable housing benefits those in housing need, and
 - the timing and conditions for the transfer of the land or affordable housing to a housing association.
- 9.4 In exceptional circumstances the Council may agree to off site provision of affordable housing or alternatively a financial or other contribution to be made towards the provision of affordable housing on another site.

- 9.5 It is intended that the Council will consider draft section 106 agreements at the same time as the planning application.
- 9.6 The affordable housing should be available, both initially and for subsequent occupancy, only to those with a demonstrable housing need. The practical implementation of this will be consistent with the approach in Circular 6/98.

10 Options for the Provision of Affordable Housing

- 10.1 The contribution of developers to affordable housing provision may vary on a site by site basis. Solihull Council will also listen to alternative suggestions that are made by developers. Notwithstanding this, the Council's approach will be as follows:
- 10.2 **On Site**
- 10.2.1 Consistent with PPG3, the Council starts from the presumption that the affordable housing provision will be provided as part of the development of the site. On site provision can be achieved in one of two ways:
- (i) The developer builds the dwellings and transfers them to the housing association.
 - (ii) The transfer of a fully serviced site, with full access rights, to a housing association.
- 10.2.2 For rented housing, the price paid by the housing association to the developer will depend on the availability of Social Housing Grant (SHG):
- In relation to (i) above where SHG is available, the housing association will be able to negotiate with the developer up to 70% of the total cost indicator (TCI). The housing association will take into account Value for Money and undertake works cost checks.
 - Where SHG is not available, the price paid by the housing association for the affordable dwellings will be determined by calculating the ability of the housing association to borrow on the basis of the net rent of the affordable dwelling. The housing association will pay to the developer the mortgage that can be serviced by the affordable rent over a 25-year term.
 - The developer will therefore fund the difference between the mortgage funded by the net rent and the TCI or the cost of developing the unit(s). The housing association will pay about 30% of TCI to the developer for the affordable dwellings.
- 10.2.3 In respect of shared ownership where there is no SHG, the housing association will negotiate with the developer regarding the purchase price to be paid. The housing association will however need to ensure, in agreement with the Council, that the resulting out-turn costs to the occupier are affordable and meet the objectives of the Council's affordable housing policy.

10 Options for the Provision of Affordable Housing

10.3 Off Site

- 10.3.1 Although the Council's preference is for affordable provision on site, it is recognised that there may be circumstances when agreements can be reached where the affordable requirement is fulfilled on other sites in the Borough. Broadly, examples of such exceptional circumstances include difficulties in achieving a mixed scheme, site and layout constraints, the nature of the local residential area or where social housing funds make onsite provision impossible.
- 10.3.2 Example: Site A capable of 35 dwellings and site B capable of 30 dwellings where the affordable requirement is 40%. The number of affordable units required on the transfer site shall be:
- (i) $35 \times 40\% = 14$ dwellings
 - (ii) $30 \times 40\% = 12$ dwellings
 - (iii) The total affordable requirement on site B would be 26 dwellings
- 10.3.3 The total requirement may be varied according to circumstances. For example the quality of the affordable scheme proposed or there may be exceptional development costs, or alternate benefits proposed (such as open space provision or other contributions).

10.4 Cash in Lieu (commuted sum)

- 10.4.1 Circular 6/98 recognises that it can be appropriate to negotiate a financial sum in place of the affordable housing requirement. 'Commuting off' of the affordable housing obligation will only occur where there is agreement between the parties. This is likely to occur where the site is suitable for an element of affordable provision but where achieving an appropriate mix of development cannot be achieved.
- 10.4.2 The Council would only expect to agree cash in lieu terms in exceptional circumstances.
- 10.4.3 The Council will draft planning obligations to allow the developer to make such contributions, on the signing of contracts to provide the affordable housing element or through a covenant. The covenant will state that money paid by the developer to the Council for the purpose of meeting or contributing towards the costs of affordable housing shall be repaid to the developer on, or by a specified date, if such sums have not been used for that purpose.
- 10.4.4 All cash in lieu payments will be placed in a ring-fenced account. Allocations from the account will be made on the basis of the Council's housing priorities set out in the Housing Strategy. This will usually mean the creation of new affordable housing opportunities within the Borough but may also be used to help improve the condition of existing dwellings in the private or social housing sectors. The payment will be used in a way consistent with Housing Corporation Circular F2-42/98 'Planning issues relating to the provision of affordable housing and Section 106 contributions by registered social landlords'.

- 10.4.5 The principle behind the cash in lieu calculation will be to allow the provision of an equivalent level of affordable housing to that on the principal site. The developer contribution to affordable housing should match the current SHG rate at 100% of TCI, with housing associations providing the remaining part through private finance and reserves.

Example: A site of 25 dwellings with an affordable requirement of 40%. The Social Housing Grant rate is 55% and the TCI per affordable dwelling is £117,900

$$25 \times 40\% \times £117,900 \times 55\% = £648,450 = \text{cash in lieu payment}$$

Note: The TCI rate used here is for a 70-75m² dwelling. The TCI rate will be set according to the mix of units that the Council would have expected on the site. The grant rate is taken from the Housing Corporation grant rate model and is for a general new build house in the West Midlands. The grant rate applied shall be that prevailing at the time.

10.5 Using housing associations

- 10.5.1 The Council thinks that housing associations are the most effective suppliers of affordable housing. The Council's strong preference is to work with housing associations who:

- already have rented accommodation in the Borough
- have recent development experience
- have a local management presence.

- 10.5.2 Details of the larger housing associations, with whom the Council works regularly, are shown below:

HOUSING ASSOCIATION	CONTACT	
Bromford Housing Group	Mr D Owen	01926 485 373
Harden Housing Association	Ms E Mark	01527 556 425
Touchstone	Mr G Siani	0247650 7100
Waterloo Housing Association	Mr G McNamee	0121 362 8927

Note: Housing associations are listed alphabetically, and the order does not indicate any order of preference.

- 10.5.3 Where a developer expresses a preference to work with a housing association not listed here, the Council will give this open consideration.

11 Design

- 11.1 All affordable housing is to comply with UDP policy H6. Developers are advised to contact any of the housing associations listed in Paragraph 10.4.2 with regard to aspects such as space standards, energy efficiency and design standards. All housing associations will always be expected to work to the latest edition of the Housing Corporations 'Scheme Development Standards'.
- 11.2 In general the Council considers that affordable housing should be spread throughout any new housing development in order to achieve a mixed and balanced community. However it is recognised that different views exist on this matter and the Council will be happy to discuss this in more detail in the context of specific proposals.

12 Monitoring and Review

- 12.1 The Council will monitor the provision of affordable housing through the process of Plan Monitor Manage in accordance with the Development Plan and the Government's expectations as outlined in Regional Planning Guidance.
- 12.2 This affordable housing guidance will also be kept under review in the light of material information and relevant Government guidance.

13 Council Contacts

NAME	POSITION	CONTACT
John Pitcher	Housing Strategy Officer	0121 704 8143
Rachel Batts	Principal Planning Officer Forward Planning	0121 704 8225
Dave Simpson	Forward Planning Manager	0121 704 6395
Gary Palmer	Team Leader (south) Development Control	0121 704 6868
Kim Winwood	Team Leader (central) Development Control	0121 704 6340
Lawrence Osbourne	Team Leader (north) Development Control	0121 704 8134
Donna Savage	Development Control Manager	0121 704 6372



Appendix

Consultation

Organisations
consulted

Representations
received

Appendix: ***Consultation***

The following organisations were consulted on this document:

Residents Associations

Balsall Common and village Residents Association
Balsall Common Residents Association
Bentley Heath Residents Association
Billsmore Green Residents Association
Catherine-de-Barnes Residents Association
Cheswick Green Residents Association
Dickens Heath Residents Association
Dickens Heath Village Residents Association
Dorridge and District Residents Association
Harwood Grove Residents Association
Hatchford Brook Residents Association
Hockley Heath Residents Association
Marston Green Residents Association
Olton Residents Association
Solihull Ratepayers Association
Shirley Residents Association
Solihull Residents Association
Tidbury Green Residents Association
Triangle Residents Association
Wells Green and Lyndon Residents Association
White House Residents Association

Parish Councils

Balsall Parish Council
Barston Parish Council
Berkswell Parish Council
Bickenhill Parish Council
Castle Bromwich Parish Council
Chelmsley Wood Town Council
Fordbridge Town Council
Hampton-in-Arden Parish Council
Hockley Heath Parish Council
Kingshurst Parish Council
Meriden Parish Council
Smith's Wood Parish Council

Appendix: *Consultation*

The following organisations were consulted on this document:

Action Groups

Ancient Monuments Society
Berkswell Society
The Georgian Society
Hampton-in-Arden Society
Knowle Society
Society for the Protection of Ancient Buildings
Victorian Society

Government Departments and Organisations

Advantage West Midlands
Age Concern
Council for the Protection of Rural England
Government Office for the West Midlands
Hampton-in-Arden Probus Club
The House Builders Federation
Housing Corporation
National Farmers Union
Solihull Access Group
Solihull Churches Action on Homelessness
Warwickshire Rural Community Council
Warwickshire Rural Housing Association
West Midlands Local Government Association

Local Authorities

Birmingham City Council
Bromsgrove District Council
Coventry City Council
Dudley Metropolitan Borough Council
North Warwickshire Borough Council
Nuneaton and Bedworth Borough Council
Rugby Borough Council
Sandwell Metropolitan Borough Council
Staffordshire County Council
Stratford-on-Avon District Council
Walsall Metropolitan Borough Council
Warwickshire County Council
Warwick District Council
Wolverhampton City Council
Worcestershire County Council

Appendix: ***Consultation***

The following organisations were consulted on this document:

Private Companies

Barton Willmore Partnership
Beazer Strategic Land
Bovis Homes
Bryant Homes
Chapman Warren
Chesterton Planning and Economics
David Wilson Homes
GVA Grimley
Laing Homes
McCarthy and Stone
Stoneleigh Planning Partnership
Westbury Homes
Wilcon Homes
William Davis Ltd.
Wimpeys

List of Respondents

Balsall Parish Council
Barton Wilmore Planning
Castle Bromwich Parish Council
Coventry City Council
David Wilson Partnership Homes
Dudley Metropolitan Borough Council
Fordham Research
House Builders Federation
Knowle Society
Level Consulting Ltd.
Meriden Parish Council
RPS Planning, Transport and Environment
Startford-on-Avon District Council
Warwickshire Rural Community Council
Waterloo Housing Association
White House Way Residents Association
William Davis Ltd.
Worcestershire County Council

Appendix: *Consultation*

The following table provides a summary of representations received and the Council's response to the issues raised:

Issue	Comments	Action Taken and Justification
1. Consistency with Government Guidance and the Development Plan.	That the SPG is premature and would be afforded little weight, as it is not consistent with Government guidance and the adopted development plan.	<p>No Change</p> <p>The Council is of the opinion that the SPG takes full account of and is consistent with Government guidance; in particular, the advice contained in PPG 3 and Circular 6/98, the Council's Housing Strategy and the Housing Needs Survey 2001. The SPG is based on and provides more detailed information to existing and emerging plan policies in the Council's adopted UDP and the UDP Review.</p> <p>Since the adoption of the current UDP in 1998, there have been significant changes, both locally and nationally, which have justified updating the Council's approach on affordable housing. The Council has an up-to-date Housing Needs Survey (June 2001) which identifies a high level of housing need in the Borough sufficient to justify a low threshold level in the UDP Review. The development of SPG at this time was considered essential to ensure the proper delivery of affordable housing.</p> <p>Attention is drawn to the recent appeal decision for Wimpey Homes v Solihull MBC (September 2002) where the Secretary of State acknowledged that the Solihull UDP Review does reflect current national policy advice in PPG 3.</p>
2. The Definition of Affordable Housing	<p>That the definition should include rented, shared ownership and low-cost market housing as well as key worker accommodation.</p> <p>That the SPG should refer to the WMLGA definition of affordable housing for consistency across the Region.</p>	<p>No Change</p> <p>The Council is satisfied that its definition is consistent with both Government and Regional guidance. In practical terms the Council's definition recognises the provision of housing for rent, shared ownership and low-cost housing all as appropriate forms of affordable housing subject to their costs being affordable to those in housing need which in our opinion accords with advice.</p> <p>The Council does not agree that 'key worker accommodation' should be acknowledged as a form of affordable housing. There is no basis in planning guidance for key worker housing. The existing forms of affordable housing can all be seen as meeting the needs of key workers, who will inevitably have different needs and aspirations.</p>

Appendix: *Consultation*

Summary of representations received and the Council's response to the issues raised:

Issue	Comments	Action Taken and Justification
3. Reduction in Site Size Threshold	<p>That lowering of the threshold should be done through the local plan process and the SPG should not be used to introduce a revised size threshold.</p> <p>That lowering the threshold would not significantly increase the level of affordable housing and, in turn, the small increase does not provide justification for lowering the threshold.</p> <p>That the proposed threshold is inappropriate in economic terms and would stifle development opportunities in the Borough.</p>	<p>No Change</p> <p>The reason for lowering the threshold is to address the changing circumstances both locally and nationally as expressed in issue 1 above. The lower threshold is identified in the UDP First Review, is consistent with Circular 6/98 and is being taken through the local plan process.</p> <p>The Council does not accept that lowering the threshold only secures a small increase in the amount of affordable housing. The Housing Needs Survey shows that moving to the lower threshold produces an additional 104 affordable dwellings, an increase of 13% over the Plan period. This is a significant additional yield.</p> <p>The Council contends that there is no evidence to support the claim that the lower threshold would stifle development in the Borough. Furthermore, the economics of provision relate to viability issues which are addressed elsewhere in the SPG.</p>
4. Justification of 'Exceptional Local Constraints'	<p>That the Council has not demonstrated 'exceptional local constraints' to justify lowering the threshold.</p> <p>That the threshold itself is not appropriate either across the Borough or to specific sites.</p>	<p>No Change</p> <p>'Exceptional local constraints' have been justified in the Council's Housing Needs Survey, Final Report June 2001, which confirms that:</p> <p>"The 'exceptional' lies in the fact that while the DETR housing needs assessment model suggests that 631 new affordable dwellings are required in the Borough per annum, the calculated yield of dwellings shows that even at 40% and with a 15 dwelling threshold, the yield is only 886 dwellings over the whole period to 2011.</p>
5. Justification for District-wide Target of 40%	<p>That further justification should be provided to explain the actual 40%.</p> <p>That the Council should only set indicative targets for specific sites and not borough-wide as proposed.</p>	<p>No Change</p> <p>The Council believes that both the 40% figure and the Borough-wide target are justified given the very high levels of need identified in the Housing Needs Survey.</p> <p>The Council has a district wide responsibility and acknowledges that it cannot always meet need exactly where it arises, thus opportunities need to be taken to redress the balance, as appropriate sites come forward, across the borough.</p>

Appendix: *Consultation*

Summary of representations received and the Council's response to the issues raised:

Issue	Comments	Action Taken and Justification
6. Tenure	<p>That planning policy should be expressed in favour of any particular form of tenure and that tenure should not be restricted or determined by the Council.</p> <p>Justification on how the tenure split has been established.</p>	<p>No Change</p> <p>It is the Council's view that the SPG is tenure neutral and would agree with the responses that tenure should not be determined or restricted by the Council. The spirit with which the guidance has been written is one of flexibility in aiming to provide a reasonable guide to the form of development. At no point is the guidance purporting to be prescriptive. The split is an assessment using knowledge of the Borough and from consultation with housing associations to give a picture of an ideal level of provision, and having taken into account such issues as the backlog of housing need and the loss of rented accommodation stock to the 'right to buy' scheme.</p> <p>With regard to the tenure neutral approach the Council would point out that Table 1 does this by defining what the authority regards as affordable in line with Circular 6/98, paragraph 9. It is then an empirical matter as to whether the different forms of affordable housing are, in fact, affordable.</p> <p>With regard to discounted affordable housing, although the Council infers a hierarchy and states its reasons, in effect it has not ruled out this form or provision altogether.</p> <p>With regard to the split on particular sites, the council do not consider it appropriate to prescribe a site specific split; this would be a matter of detail to be negotiated at the detailed application stage.</p>
Issue	Comments	Action Taken and Justification
7. Evidence of Housing Need and accuracy of the Housing Needs Survey	<p>In analysing a number of Housing Needs Survey carried out by Fordham Research, failure found to undertake a rigorous assessment of affordability. The shortfall of 631 is based on flawed and incomplete assessment of housing in the Borough.</p>	<p>No Change</p> <p>The Council refutes these comments and confirms that the Housing Needs Survey, which underpins its emerging policy on affordable housing, followed the methodology in the ODPM document 'Local Housing needs Assessment: A guide to Good Practice'.</p>
Issue	Comments	Action Taken and Justification
8. Perpetuity	<p>The Council cannot expect the dwellings to be available in perpetuity, as this will make it impossible for providers of affordable housing to access private finances. Plus all SHG funded housing is subject to 'Right to Acquire' and thus securing affordable housing both initially and for subsequent occupancy is contrary to Government legislation.</p>	<p>Paragraphs 4.8 - 4.10 were amended and expanded and paragraph 4.11 was added in response to this issue</p>

Appendix: *Consultation*

Summary of representations received and the Council's response to the issues raised:

Issue	Comments	Action Taken and Justification
9. Site Suitability Criteria	<p>Circular 6/98 details a range of criteria; the SPG fails to mention economics of provision (or proximity to services) and the need to achieve a successful housing development.</p>	<p>Paragraph 6.1 and the Executive Summary were amended in response to this issue</p> <p>Agree – Criteria in respect of economics of provision (and services) should be included, as well as wording to acknowledge 'the need to achieve a successful housing development'.</p>
10. Viability Analysis	<p>Developers should not be required to submit a viability analysis.</p> <p>What information are developers to include. Reference to confidentiality required.</p>	<p>A reference to confidentiality was added to paragraph 6.4.2</p> <p>The respondents do not say why a developer should not have to submit a viability analysis. However, an analysis would only be requested where it is essential, where the developed indicates the viability of the site would be in doubt if affordable housing provided. This issue is one of the fundamental criteria for assessing site suitability.</p> <p>The independent valuer would agree information for inclusion, in consultation with the developer and the Council.</p> <p>The point with regard to confidentiality is accepted and a reference to this is to be added to the text.</p>
11. Calculating Cash in Lieu Contributions	<p>The Council's method of calculating the extent of any contribution goes beyond what is acceptable in terms of C1/97. It is unacceptable for local authorities to set out precise requirements or impose rigid formulae.</p> <p>The mechanism for calculating cash in lieu should take into account that part of the requirement may have been provided as shared ownership or low cost market housing. The TCI based calculation is only applicable to social rented accommodation.</p> <p>The Council's formula for calculating a commuted sum is not fair and equitable. Any commuted sum should only reflect the subsidy a developer would ordinarily provide.</p>	<p>Paragraph 10.4.1 was expanded</p> <p>The Council acknowledges that there are many different approaches to calculating cash in lieu contributions. The Council has therefore sought to outline how it would approach determining a financial sum, rather than imposing a rigid formula. Commuting off of the affordable housing obligation is feasible where there is agreement between the parties but the principle behind the calculation proposed is that it allows an equivalent number of affordable dwellings to be provided off site as there would have been on site. (The calculation is achieved using a recognised method and essentially is aimed to be a guide).</p> <p>The cash in lieu calculation can accommodate shared ownership as well as rented housing, or a mix of the two, by altering the grant rate percentage.</p>

Appendix: *Consultation*

Summary of representations received and the Council's response to the issues raised:

Issue	Comments	Action Taken and Justification
12. Justification for Off-site Provision	<p>Delete policy – there is no justification for requiring off-site provision or contributions in cases where a site is incapable of accommodating affordable housing.</p> <p>This arrangement should not be used for sites which are inherently unsuitable for the provision of affordable housing as per C6/98, para. 22.</p>	<p>No Change</p> <p>This is a misinterpretation of the guidance – it is not the intention to seek off-site provision where a site is incapable of provision in the first place.</p>
Issue	Comments	Action Taken and Justification
13. Setting Total Cost Indicator (TCI) Limits	<p>At below market value is subjective and should be deleted. The limit of TCI should be expressed as 100% or 110%.</p> <p>Concern on using 100% TCI limit – 80% TCI would be more related to norm grant, 100% could mean an imbalance in grant distribution. TCI figures for Solihull are typically of a 13% on-cost allowance.</p>	<p>Paragraph 10.2.2 was amended</p> <p>The two comments are pulling in opposite directions. The SPG has been amended in agreement with the second point. This also reflects possible changes in the Housing Corporations policy on paying Social Housing Grant on Section 106 sites, which has been signalled since the SPG was sent out for consultation.</p>
Issue	Comments	Action Taken and Justification
14. Explanation of Terminology	<p>Suggests include a definition of 'rental stream approach' to address on site provision.</p> <p>Suggests include definition of Total Cost Indicator (TCI) for benefit of users of the document.</p>	<p>Paragraph 10.2.1 part i was amended</p> <p>The reference to 'rental stream approach' to be deleted.</p> <p>Social Housing Grant is capital funding provided by the Housing Corporation. For rented dwellings the grant rate is approximately 70% of the cost of the housing; the remainder is funded by the housing association which borrows the money privately. With shared ownership the grant rate is lower, typically around 30% of the cost.</p> <p>TCIs are produced by the Housing Corporation and show the cost of building dwellings of different sizes across different areas of the country. The figures are used by the Housing Corporation in determining the maximum level of grant that they will support for an affordable dwelling.</p>
Issue	Comments	Action Taken and Justification
15. Achieving On-site Provision	<p>The two ways detailed in the SPG for achieving on-site provision are not acceptable. Developers should only have to provide the difference between the open market land value and affordable housing land value. No legality to expect the transfer of a fully serviced site to a housing association below market value.</p>	<p>Paragraph 10.2.1, part ii was amended</p> <p>The Council generally disagrees with the comments received on this matter, but for the sake of clarity such terms as 'below market value' can be ambiguous and it is intended to delete the reference to this form of text. In doing so the Council would stress the main point being in provision either off or on-site, that it is essential to ensure that the price results in affordable monthly costs to local people in housing need.</p>

Appendix: *Consultation*

Summary of representations received and the Council's response to the issues raised:

Issue	Comments	Action Taken and Justification
16. S106 Agreements	<p>That clauses setting out the location and distribution of affordable housing within a site, and clauses relating to the timing and conditions for the transfer of the land, are inappropriate.</p> <p>A further clause referring to "development standards to be applied to construction" should be included. All affordable homes should be built to Housing Corporation development standards, unless an alternative approach is to be taken.</p>	<p>No Change</p> <p>The primary response to this issue is the fact that the wording states that the suggested clauses or requirements may be included. It is not the intention to be prescriptive and require these automatically. The requirements have been set out as a guide of what might be required as appropriate and through negotiation.</p> <p>With regard to timing and conditions for the transfer of land, again this is not intended to be prescriptive. Such a clause however would be beneficial to ensure that the affordable element is not left until the end of the development where there may be a possibility that it may never be built.</p> <p>With regard to the third point, development standards are referred to in Section 11.</p>
17. Five-year Projection of Housing Needs	<p>The Housing Needs Survey provides for a five-year projection. It would be more realistic for the Council to seek to project housing needs over the period 1998 to 2011.</p>	<p>No Change</p> <p>The Local Housing Needs Assessment, page 36, says that surveys generally have a life of 5-7 years and it is therefore impractical to have a robust projection to 2011. The Council will however commission a further housing needs survey in due course which will take a needs projection to 2011.</p>
18. Further General Points	<p>Affordable housing should be supported.</p> <p>Affordable housing should be close to amenities.</p> <p>Low cost housing should be well built. Welcome statement that building standards should not be reduced.</p> <p>Affordable homes should be in perpetuity.</p> <p>Each major development should include good numbers of affordable properties.</p> <p>Off site provision must be strictly enforced.</p> <p>Document thoughtful and comprehensive.</p> <p>Welcome 40% target on sites over 15 dwellings.</p> <p>Concerned that policy on access to public transport would disadvantage rural communities.</p>	<p>No Change</p>

 Printed on recycled paper

FORWARD PLANNING
PLANNING SERVICES GROUP
Physical and Economic Regeneration Division
Strategic Services Directorate
Solihull Metropolitan Borough Council
P O Box 18 Council House Solihull West Midlands B91 3QS
T: 0121 704 6000 F: 0121 704 6404
E: ForwardPlans@solihull.gov.uk
www.solihull.gov.uk