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Dear Planning Policy Team,

Solihull Issues and Options Consultation Feb- March 2026

1. Thank you for consulting with the Home Builders Federation (HBF) on the Solihull Issues and Options Local Plan (Reg 18) Consultation Feb – March 2026.
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. Our response begins with some overarching comments on the potential impacts of the changing nature of the planning system, before our more detailed comments in response to the 49 questions that have been asked as part of this consultation. We have not responded to every question, only those of relevance to our members. We have provided our comments on the basis that the Council is intending to progress their plan under the transitional arrangements, as this is basis under which this consultation is being undertaken. If the Council chose instead to revert back to their earlier decision to produce the next Solihull Local Plan under the new plan-making system, we would wish to provide further comments as this change of context would be expected to have significant implication for the timescale, scope and content of both the Plan and the plan-making process.
4. We hope the Council find the following comments helpful and would welcome further discussion with you on the matters that we raise. Please do let me know if HBF can be of any further assistance in facilitating discussion with the development industry about the next Solihull Local Plan.

Impacts of removal of the legal requirement of Duty to Cooperate

5. As you will be aware the Government is not saving the Duty to Cooperate (DTC) requirement as a legal test for new Local Plans. However, there is clearly still an expectation that Councils will work together on effective plan-making and there remains a clear expectation that the housing needs of an area will still be met in full. Although compliance with DTC is no longer a legal compliance it is still part of the tests of soundness for the Plan.
6. Even without the Duty to Cooperate as a legal test, there is clearly still a requirement for the Solihull Plan to maximise housing provision within the plan area, and clearly recognise the longstanding issue of unmet housing need within Birmingham and the Black Country. It is essential that any unmet housing need is addressed.

Impacts of the Dec 2025 NPPF consultation

7. As you will be aware the Government published its long-awaited proposed revisions to the NPPF for consultation on 16th Dec 2025 and this consultation closed on 10th March 2026. Whilst this is clearly still consultation it clearly sets out the expectations and direction of travel of the Government. The new NPPF clearly shows the importance that is being placed on addressing the housing crisis and the clear move towards a more rules-based planning system that provides more certainty for everyone. It is very clear that the Government is expecting Local Plan to do more to help to address the housing crisis and there is a clear expectation that all Councils should be planning to meet their housing needs in full.
8. Although in the medium term it is anticipated that sub-regional housing numbers and issues of redistribution of any unmet housing needs where they occur will be addressed through SDSs. However, in the interim it is still essential that work with neighbouring authorities to address unmet needs continues. This is particularly important if Solihull is intending to progress its new Local Plan under the old system, and not under the new 30 month plan-making process that will be brought in later this year. We would encourage the Council to consider this matter carefully.
9. Although we recognise the longstanding challenges and constraints facing Birmingham and the Black County in terms of meeting its housing needs in full, the Council will still need to provide clear and robust evidence of the role that the Solihull Plan can, and should play, in helping to meet this unmet need. HBF believe that the Solihull Plan, if being progressed under the transitional arrangements, will need to demonstrate that everything possible has been done to maximise housing delivery within their area. The Local Plan and its evidence will also need to show how any unmet need that remains are being addressed and set out if and how this is being addressed through partnership working with neighbouring authorities. A failure to do this, would fail the strategic planning soundness test that replaces the DTC.
10. HBF also notes the Government's intention to move towards a new more rules-based approach with consistency across standard common matters being provided at the national level. The Dec 2025 NPPF consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b. HBF would therefore strongly encourage the Council to fully consider the scope and content of this Plan. The proposals clearly set out that the Government view is that Local Policies which conflict with the new NPPF will not be able to be taken into account in decision-making. Committing to a new Solihull Local Plan that includes the development of a suite of Development Management policies that will be replaced and made redundant by the new NPPF may not be the best way to proceed, especially in a time of scarce resources and budget constraints.

Question 1. Do you have any views on the approach the Council is intending to take to continue to use the legacy plan-making arrangements and move from this consultation to a Regulation 19 plan later this year?

11. HBF welcomes the Council's efforts to ensure that they have an up to date Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. However, we are very concerned that the Council appears to be rushing to get a plan approved under the transitional arrangements when this is not realistic in terms of the work involved, and as such is likely to result in an unsound plan.

12. We note that the Council appears to have changed its mind in relation to whether or not there remains a possibility that this emerging local plan can still be completed under the legacy system. The current LDS sets out the time it is expected to take to produce a Local Plan under the new system, a new system intended to speed up the process. However, now the Council have concluded that they now in fact think they able to prepare the required Plan ready for submission for examination by December 2026. We are unaware of what change in circumstances justify this new expediency. We are not aware of any significant increase in the budget or resources now available to undertake all the work required. We are unaware of successful recruitment of significant additional planning and other staff that will enable the robust evidence base to be prepared that will inform the choices and plan-making decisions that need to be taken as the plan is prepared. We are also unaware of any changes to the governance and oversight processes at the Council that would speed up the plan-making processes.
13. In fact, it seems the Council is instead aiming to speed up the process of plan-making to enable it to hit the Dec 26 deadline through limiting the scope of the new Plan. In not undertaking a full Green Belt review, not considering whether the housing requirement should be higher to support growth and deliver affordable housing, failing to tackle the issues of unmet need of neighbouring authorities, not planning for the longer term housing of Solihull through allocations, but leaving this to broad area of search, talking about the potential for new settlements but not defining the location of these, the process of plan-making may be quicker. However, in failing to address these, and other fundamental issues, within the Solihull Plan, the Council increases the risk its Plan will be ineffective, unjustified, not in compliance with national policy, is not positively prepared and is therefore unsound.
14. We would highlight the recent experience of Wiltshire's Local Plan as a cautionary tale. This Plan was also produced in haste and has been found deficient in a number of areas which could not be addressed through a realistic programme of additional work, evidence preparation and Main Modifications, so that the Inspectors have now recommended it is withdrawn.
15. It is important for the Council to recognise that the transitional arrangements test that enable plans to proceed under transitional arrangements where they are planning to meet 80% of standard method housing requirements is a stop/go pass/fail type test and one that does not exempt the Plan from still needing to comply with the requirements for soundness.
16. Government policy has clearly set out the for a significant increase in house building in order to deliver the 1.5 million new homes in this Parliament, and this provides an important context for the preparation of any Local Plan. In HBF's view the Council should be seeking to plan proactively for their area and this requires an acceptance of the fact that the new standard method results in higher housing requirements. In order to address the current and worsening housing crisis, there is a clear need both nationally and local for Local Plans to play an important part in helping to increase the delivery of homes, by planning for them.
17. In addition, the issue of unmet need in Birmingham and the Black Country is well-known and long-standing. It is therefore very important, regardless of which planning system the Council develop their new Local Plan under, all efforts are made to maximise housing delivery within the Solihull area and clear plans are in place to ensure any unmet needs of the wider area are addressed. Whatever approach the Solihull Local Plan takes to address, or not, this needs it will need to be robustly demonstrated and supported with evidence. HBF question how achievable this is within the proposed timetable for plan production.

18. We also note that even under the new 30 month plan-making system, which assumes a streamlined process and reduced need for detailed DM policies, the proposition of getting from first stage (equivalent to the Issues and Options this Plan is at now in March 2026) through a robust and well-evidenced Plan ready for submission to PINS before December 2026 would probably be ambitious to the point of being disingenuous.

Question 2. Do you have any views on this approach the Council is intending to make regarding the likely scope of the subsequent Regulation 19 plan to identify broad locations for growth in years 6-15 of the plan rather than specific sites?

19. HBF cannot support a plan which seeks to only provide broad locations of growth for future housing from year six of the Plan onwards. There is simply no substitute for an allocation when it comes to de-risking projects and enabling developers to have the certainty they need, for example to access finance. Failing to plan for the housing needs over the long term will result in an unsound plan that is not effective, justified, in compliance with national policy. Such an approach simply cannot be said to be positively prepared. We would also again highlight the problems that Wiltshire ran into with their Local Plan in relation to their Sustainability Appraisal and broad locations of growth, which, in part, resulted in the failure of that Plan.
20. As detailed above the new Solihull Plan will need to be positively prepared, justified, effective and in compliance with national policy. In seeking to rely on only areas of search for all the housing need beyond year six of the Plan, HBF suggest the Plan is unlikely to be able to show compliance with these tests.
21. We also note that Inspectors considering Solihull 2020 (Draft Submission Plan) had concerns about the land supply included in the plan, and that this Plan was withdrawn from examination in October 2024. It will be important that the Council learns the lessons of this experience and ensure it plans for enough new homes in the next Solihull Local Plan.

Question 3. Do you believe these are the challenges that the local plan should be addressing? Are any included that you believe aren't necessary, or do you believe some are missing?

22. As set out above HBF believe the Plan should be planning for the housing needs of Solihull in full and the failure to do this will result in an unsound Plan. The purpose of a Local Plan is to try and provide certainty for developers and communities on what new development is coming forward, when and where, and how the infrastructure to support it will be delivered. A Plan that fails to do this, will be unsound.
23. We also consider that if this Plan is intending to proceed under the transitional arrangements, then there is a need for the Plan to consider if it should be planning for more housing, including to help meet unmet needs. The Council cannot pick and choose the bits of the relevant NPPF and the housing need methodology it wants to consider.
24. We would also reiterate the comments that HBF made in response to the Settlement Hierarchy consultation, which appear to have been completely ignored. We remain of the view that the only appropriate way for the Council to seek to change the designation of villages to towns, or vice versa, is through the plan-making process.

Question 4. Do you believe this is the right vision for the Borough, if not why not, and what would be the alternative?

25. No. The Plan's vision should include clear reference and acknowledgement of the need to meet housing needs in full.

Question 5. How should the Council, through the Local Plan, seek to maximise the benefit these key economic assets make to the Borough?

26. HBF would suggest that the Plan needs to consider a higher housing requirement to support economic growth of both Solihull and the wider region. It is important to recognise that new housing growth can support new jobs, and that new economic development can result in the need for the more homes.

Question 6. How should the Council, through the Local Plan, seek to encourage and plan for other commercial and employment activity across the Borough?

27. See response to Question 5 above

Question 7. Do you believe it is appropriate for the Council, through this plan-making process, to just seek to accommodate its own needs with any necessary redistribution of housing needs to be addressed through the emerging West Midlands Spatial Development Strategy, if not why?

28. No. For the reasons detailed above HBF cannot see how a Plan that adopted such an approach could meet the tests of soundness particularly if it is being progressed under the transitional arrangements. It is simply unacceptable that the known and longstanding issue of unmet housing needs in Birmingham and the Black Country remains unaddressed.
29. Although in the medium term it is anticipated that sub-regional housing numbers and issues of redistribution of any unmet housing needs where they occur will be addressed through SDSs, these will not be in place for some time, and at present even the geography of those SDS have yet to be decided. Therefore, in the interim it is still essential that work with neighbouring authorities to address unmet needs continues. This is particularly important if Solihull is intending to progress its new Local Plan under the old NPPF system, as addressing unmet needs through increasing housing requirement elsewhere is a key plank of this system.
30. HBF would expect Solihull Local Plan to be an ambitious plan that plans for the future development of their area, detailing where new housing will go, meeting housing needs, providing certainty for the house building industry and setting out how the Solihull Plan contributes to the long-term vision for the wider Region, in accordance with the NPPF. Instead, it seems the Council is proposing to prepare a new Plan that is seeking to reduce and limit the amount of housing planned for in Solihull under the auspices of meeting only "local need". It seems the new Plan would be actively seeking to deliver as little housing as possible, despite the housing crisis. A plan which is not effectively planning for the housing delivery that is needed later in the plan period as possible, in short, a plan that is simply not fit for purpose.

Question 8. Should all of the allocated sites from the 2020 plan be carried forward into the emerging plan? If not, why not (for instance has there been a material changes in circumstances with one or more of the allocated sites), if so, please state which site(s) and how circumstances may have changed)?

31. The Council will need to demonstrate whether or not it is appropriate to roll forward any, some or all of the allocated sites in the current Solihull Local Plan. HFB suggest it do this in partnership with site promoters and developers. It will be important to understand the current status of development on those potential site allocations sites and what if any factors have impacted on their delivery. It will be important that any site that are allocated (including any brought forward from the 2020 draft Local Plan that was abandoned) the next Solihull Local Plan are shown to be deliverable and viable, and the evidence shows that these have been robustly tested by a whole plan viability study.
32. HBF also note that the viability and deliverability of development in general has become more difficult since the adoption of the 2020 strategy owing to changing economic circumstances, the ever-increasing regulatory burden on developers. It will be essential that the whole plan viability testing of the next Solihull Plan reflects the current viability issues and challenges.
33. Again, we draw the Council's attention to problems that the Wiltshire Local Plan encountered in seeking to roll forward some allocations from the current Wiltshire Local Plan without clear and robust evidence to test this in the context of the new Wiltshire Local Plan.

Question 9. Is there evidence to suggest that this windfall rate should be lower, it's about right, or that it should be higher?

34. HBF note that the NPPF only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. We note that the past delivery of housing on windfall sites where an authority does not have an up-to-date Plan, could also reasonably be expected to be different once a new Plan is adopted.
35. HBF also note that by including windfalls within the Plan's housing requirement the opportunity for windfalls to provide some additional housing numbers is removed. Windfalls do not provide the same choice and flexibility in the market as additional allocations. HBF are also of the view that any buffer provided by windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard Method to provide choice and competition in the land market.
36. HBF are of the view that any allowance for windfall should not be included until the fourth year of a housing trajectory, given the likelihood that dwellings being completed within the next three years will already be known about (as they are likely to need to have already received planning permission to be completed within that timeframe).
37. We also note that the delivery of Biodiversity Net Gain (BNG) on small brownfield sites is proving to be very difficult especially where there is open mosaic habitat present. This also brings into question the ability to rely on evidence on past windfall delivery from these sort of sites that occurred before mandatory BNG was a requirement.

Questions 10 and 11. Are there more opportunities in the town centre or at the NEC to identify additional capacity, if so, how much more? and

If you favour 'going higher' in locations such as the town centre or Arden Cross/the NEC, do you have any views on how high (i.e. the number of storeys) new buildings could be?

38. The Council needs to be realistic about how much housing growth can be realistically be brought forward via flatted schemes. It will be important that the Plan delivers a range and choice of sites to meet the full range of housing needs. This is likely to include the need for both brownfield and greenfield sites, as some sites are more suited to particular kind of built development, supporting a particular range or type of homes

12. Are there any other non-Green Belt opportunities that should be considered? If so where, what do you think the capacity would be and what evidence is this based on?

39. It will be essential that the Council undertakes a full Call for Sites exercise as part of the process for preparing this next Solihull Local Plan, and fully and robustly considers the opportunities for development across their area. It is important that all opportunities for development be they on brownfield, greenfield, Grey Belt or Green Belt are properly assessed for their potential for development. The need to undertake this evidence based work adds to our concern about how realistic the timetable for preparing this Plan is.

Question 13. What would be an appropriate and justifiable housing supply that could be delivered at Arden Cross in the plan period, and what is the evidence for this number?

40. The Council will need to consider this issue as part of the viability evidence to support this Plan which should include site specific viability of any strategic sites, or potential strategic sites.

Question 14. Is there evidence to suggest that any additional capacity for the allocated sites is possible?

41. Again, the evidence base for the next Solihull Local Plan will need to show how it has considered this issue. As HBF have suggested, the Council should work with the developers and site promoters of the current allocations to ensure they have an up-to-date picture of what is viable, achievable and deliverable on each of these sites.

Question 15. Should the spatial strategy be amended to accommodate at least 1 new settlement? If so, where could this settlement be located and how many homes could it deliver in the plan period?

42. HBF do not comment on individual sites, although we would expect the Plan to include a range and housing sites to meet the housing needs of the area in full. There may be a potential role for a new settlement within the strategy of the Plan, but any decision of if and where it would go must be well thought through and justified. This is why a clear evidence base and meaningful public consultation are such important elements of the plan-making system.
43. We would also again note that the suggestion that the Council would be able to decide to include one, or more, new communities as part of its settlement strategy for the Plan, and prepare the evidence necessary to support the identification and/or allocation of the new settlement or settlements location by the end of December this year is very questionable. We again highlight the problems of the recent Wiltshire Local Plan where the new community was identified only as broad area of

search but was still contributing to housing numbers within the plan period. This was one of many reasons that the Plan was ultimately found to be unsound. We would again caution the Council against rushing to prepare an potentially unsound plan versus taking the time need to prepare a sound Plan.

44. If Solihull intends to develop a new settlement, or new settlements as one of the ways to meet their housing need, this decision must be taken now. It can take many years if not decades for a new settlement to be delivered, and any suggestion that houses would be completed and able to make contribution to the housing land supply during the proposed plan period would be ambitious to the point of being probably undeliverable, even if the decision to progress a new settlement was made now. Framing any discussion around new settlements to only referring to broad locations and deferring the decision on the exact location until later means any new settlement will not be able to make any contribution of the land supply of this Plan, and that the Plan is not being positively prepared and as such is unsound.
45. If a new community is needed it will take time for it to be worked up and developed, even after a decision has been made on its location and scale. Securing outline and detailed planning permission takes time, and the development still need to be built out. The Solihull Plan should be an actual plan, not a plan to have plan in the future. To adopt such an approach seems at odds with the whole purpose of the plan-making process and fails to provide the certainty the development industry and local communities need.
46. If the decision is taken that a new community is not the way to meet housing need in Solihull, alternative measures to address this need will be required. In failing to decide on this issue, the Plan would not be not dealing with this issue, and therefore not making the decision it needs to in relation to housing land supply and housing delivery. The Plan would therefore be failing to provide an effective strategy for the development of Solihull as it would not be positively prepared, and as such would be unsound.

Question 16. Do you believe there are other examples where large scale development could take place if integrated infrastructure were provided as part of the development proposals? If so, where should they be located and what is the leading infrastructure that would need to be provided?

47. An up-to-date Infrastructure Delivery Plan (IDP) will also be an essential part of the evidence base for the new Solihull Local Plan. The need or opportunity to provide essential infrastructure in an integrated way will need to inform the choices being made in the Plan.

Question 17. What are your views on the emerging plan including a balance of site typologies? What are the advantages and/or disadvantages of incorporating large, medium or small sites in the land supply?

48. The Council needs to plan to meet its housing needs through a range of sites. This should include small medium and large sites ot provide range and choice in the market.
49. The NPPF requires that the Council should set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare. Indeed, the HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but

rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.

50. HBF also note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly), be of a scale that can come forward and making a contribution to housing numbers earlier in the plan period.
51. HBF also note the Government's intention to bring in a new category of medium size sites, in addition to the current major (10 homes or more) and minor (less than 10 homes) categories. HBF suggest that the council will need to give full and careful consideration to the implications of this change to the next Solihull Local Plan.

Question 18. Are the delivery rates outlined above reasonable assumptions to be used in calculating a housing trajectory over the course of a plan?

52. The Council will need to ensure that any evidence submitted during the examination of the 2020 Local Plan, which it seeks to continue to rely on remains valid up-to-date, or it must be refreshed and updated.

Question 20. Should development be focused on the northwest of the Borough's rural towns, even if this means that more vulnerable Green Belt land may have to be released?

53. HBF do not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.
54. The Council will need to undertake a full Green Belt review as part of the evidence base for this Plan. This evidence needs to inform both the spatial strategy of the Plan and individual site allocations. Again, HBF do not comment on individual site allocations, but note that site allocations should be informed by the spatial strategy, and informed by the evidence base.
55. The Plan will also have to consider and evidence how this Plan has considered and addressed the housing and other development needs of the towns, villages and rural areas within Solihull.

Question 21. Is 800m an appropriate measure to use to define a 'reasonable walking distance' of a railway station, if so why do you believe so, or if not why not and what alternative would you suggest?

56. In light of the recent (Dec 2025) NPPF consultation we expect that the definition of 'reasonable walking distance'; will be established in national policy. Even if the Plan is being progressed under the transitional arrangement, we would still suggest that the Plan should be guided by this.

Question 22. Should the Spatial Strategy in the new plan take into account the benefit developments can have to make rural services viable, even if they are located in less accessible locations?

57. The Plan will need to consider the issue of supporting sustainable rural development. HBF would suggest that this should include the allocation of sites for new homes within the rural areas in village locations. When considering the sustainability of villages for new housing, HBF argue that the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village. We note that the provision of additional housing sites in villages can play a very important role in helping to support rural development.

Question 23. What factors should the Council take into account when assessing whether its approach to Green Belt land release would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan?

58. The Council needs to apply national policy for Green Belts and also should undertake a Green Belt review in line with the NPPF and PPG.

Question 24. The Green Belt has potential to provide other benefits that extend beyond the 5 purposes of including land in the Green Belt. What do you believe these additional benefits could be and what evidence do you believe there is, or there could be, to support this approach?

59. The Council needs to undertake a Green Belt review in line with the NPPF and PPG. It is not appropriate for the Council to seek to redefine national Green Belt policy. However, HBF would welcome the Council giving proper consideration to how all the policies in the Plan are intended to work together. This should, for example, include giving consideration to how Green Belt policies interact with BNG policies that support the delivery of off-site BNG units through habitat banks. Another example would be the need for the Plan to be clear on how it interact with the Local Nature Recovery Strategy, including the interaction between LNRS priority areas and the Green Belt.

Question 25. Should the Council develop a Strategic Gap Policy to protect vulnerable gaps between settlements, and if so why (or why not)? and

Question 26. What evidence do you believe may justify this approach? And

Question 27. If a Strategic Gap Policy were to be developed, which gap or gaps do you believe it should cover and why?

60. There would need to be a robust evidence base in place to justify the inclusion of a policy on Strategic Gaps within the Plan, and any policy would need to serve a planning purpose. HBF would caution against the development of any policy on strategic gaps that seeks to use this as a tool to prevent new development. Although it is reasonable for any impact on the coalescence of settlements to be a factor that is considered in the site selection process, this is very different from using it as a reason to rule out any new development in these locations.

Questions 32- 40 on Infrastructure and Developer Contributions

61. As Section 106 contributions can only be sought from development to mitigate its own impact and not deal with existing deficiencies it will be import for the Solihull Plan to be supported with robust evidence that justifies any s106 contributions being sought. The Developer Contributions policy should also be clear that, in order to comply with the regulations, an assessment of any specific contributions required will need to be made at the point of determining a planning application.

Question 41. Do you believe the Council ought to seek comprehensive developments in this way, if so why (or why not)? and

Question 42. Do you believe that if site promoters and/or developers can't demonstrate that a comprehensive approach has been followed that the site or sites should not be allocated?

62. It is difficult to see how the proposed approach to requiring comprehensive development is compatible with the proposed approach to only identify broad areas of search for new housing beyond Year 6 of the Plan. It is unreasonable to seek to require developers to work together to deliver a development when the boundary of such an area is unknown or unclear. The proposal to not allocate sites where developers have not agreed to work together seems unreasonable especially as land ownership can change over time.

Question 43. Do you believe that the Council should seek to explore additional net gain, if so by how much, and what evidence do you believe would be needed to justify this approach?

63. HBF was involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time, including feeding into the BNG Planning Practice Guidance and the DEFRA BNG Guidance, and continue to be involved in this work through sitting on the FHH BNG Implementation Board. This group seeks to ensure that BNG can deliver the win for nature and the win for housing as intended, by identifying challenges in the implementation of this policy and trying to find solution to them. HBF recognises the role that development can play in helping to support nature recovery. However, it is also important BNG delivers the win-win intended and does not become a barrier to housing delivery.

64. Experience has found that delivering the 10% BNG requirements can be very challenging in some cases, particularly on brownfield site where open mosaic habitat is present, and on some of the smallest sites where on-site BNG provision requires a disproportionate amount of the developable area to be used for BNG. As 10% BNG is mandatory, where viability challenges are encountered then it is usually affordable housing that it reduced to accommodate this.

65. HBF are of the view therefore that is not appropriate for Local Plan to seek to go further and faster than national policy and so seeking more than 10% BNG is not justified. It is important that BNG remains the win-win for development and nature that it was always intended to be and does not become a barrier to much needed housing growth.

66. It is also not appropriate, or sound, for this policy to seek to add to and augment the national policy on BNG, and indeed national policy explicitly seeks to prevent this from happening. We also note that the recent NPPF (Dec 2025) consultation indicates that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to allocations, and even then only where this is clearly evidenced and justified.

67. HBF also note that the Government (via DEFRA) recently undertook a consultation on potential revisions to the national BNG requirement and is now proposing sites under 0.2 Ha are exempt from BNG. Further work on other possible improvements to the working of the policy in practice are ongoing and it will be important that the Plan's policy reflects the latest BNG policy and guidance under the Environment Act.

Question 44. What approach to housing mix in new developments do you believe the Council should take?

68. Again, it will be important that any housing mix policy is informed by local evidence. It is usual for these kinds of policies to reference the need to consider circumstances at the time of a planning application and the latest available information. HBF also note the Government intention as indicated in the Dec 2025 NPPF consultation that it does not wish Local Plans to be overly prescriptive in relation to market housing.

Question 45. Do you believe that the Council should include discounted housing as part of the affordable housing mix it seeks to have included on new developments, if so, which is preferred, First Homes or Discounted Market Sales? and

Question 46. What should the discount be for this type of product, 20% (as a minimum), 30%, 40%, or 50% (as a maximum)? Or some other figure between 20% and 50%.

69. HBF note that First Homes are no longer one of the Government's preferred methods for delivering affordable housing. The Solihull Local Plan will need to be supported with evidence and robust viability testing to justify its policy requirements. It will also need to reflect the current Government definitions of affordable housing.

Question 47. What level of affordable housing should be provided on development sites? and

Question 48. What should be the percentage split of affordable housing products be, between social rented, shared ownership and first homes/discounted market sales?

70. This will need to be informed by local evidence. This must include a robust whole plan viability appraisal which is an essential part of the evidence base that tests whether the range of the policies in the plan as a whole make development unviable. To be most useful HBF suggests viability appraisals should be used in an iterative manner to test different policy combinations. HBF suggests that the whole plan viability assessment should be produced in tandem with the different stages of plan-making.

49. Are the approaches set out in Policy P9 Mitigating and Adapting to Climate Change in the 2020 plan, still the correct ones to incorporate into local plan policy moving forward, or should any other approaches be followed?

71. HBF note that any requirements for network connectivity will need to be informed by realistic proposals, not merely aspirations.

72. The matter of the energy performance of individual homes is currently addressed through Building Regulations and will be addressed through the Future Homes Standard. There is therefore no need for a policy on this issue in any Local Plan.

Future Engagement

73. I trust that the Council will find these comments useful undertakes work on its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house-building industry.

74. HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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