

Matter 5 - Housing Need

Core Policy CP4: Housing Development

Issue 1: Housing Requirement

1. *Is the housing requirement, higher than the standard method Local Housing Need (LHN), justified by the planned economic growth?*

- 1.1. Policy CP4 states that the Council will seek to deliver a minimum of 447 net new dwellings per annum (dpa) over the Plan period 2021-2037.
- 1.2. The NPPF¹ states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure². The Standard Method identifies a minimum Local Housing Need (LHN) of 149dpa³. The PPG⁴ also sets out when it might be appropriate to plan for a higher housing need figure than the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.
- 1.3. The HBF generally supports the Council in utilising a figure over and above the LHN identified by the Standard Method and supported by their own Housing and Economic Needs Assessment (HENA) evidence.
- 1.4. The Plan proposes to deliver at least 46ha of new employment land over the period 2021-2037. The HENA sets an economic growth scenario for the Borough which identifies a need for 198,451sqm of new employment floorspace over the period 2021-2037⁵. It suggests that the creation of new employment floorspace of this scale will help to facilitate 5,127 new jobs⁶. The HENA identifies 447 dwellings are needed to provide the resident workforce to fill these jobs based on a 1:1 commuting ratio.

2. *The 2021 HENA Update (E32) assumes a 1:1 migration where the increase in people living in the area would equal the increase in people working in the area. Is this realistic?*

- 2.1. The HBF considers this is a question for the Council and their consultants.

3. *Should the economic growth being planned proceed much slower than anticipated but the housing allocations proceed at or around the expected rate, what would be the implications for the Plans objective of balanced growth?*

- 3.1. The HBF considers that the Council should work closely with the developers of employment development to ensure economic development is delivered as expected. The HBF also

¹ NPPF 2021 Paragraph 61

² PPG ID:2a-004-20201216

³ MHCLG Household Projections 2014 2022: 58,418, 2030:59,833, average change 141.5. Adjustment factor 2020: 1.0531.

⁴ PPG ID: 2a-010-20201216

⁵ HENA Table 9.12 page 66

⁶ HENA Table 10.1 page 68

considers that as the Council will be undertaking a review of the Plan they should be able to monitor delivery and take appropriate actions to aid in future delivery. The HBF would also highlight the significant benefits of providing new homes including their energy efficiency, the biodiversity net gain, the provision of affordable homes, the provision of EV Charging Points, their increased accessibility, their contribution to the economy and contributions to other services and facilities.

4. *What is the basis for the assumptions made in the Economic Housing Led Needs Model? Are they robust?*

4.1. The HBF considers this is a question for the Council and their consultants.

5. *Paragraph 11.9 of the HENA 2021 Update (E32) recognises that economic led housing need is higher than recent delivery trends. What evidence is there that it would be achievable?*

5.1. The HBF considers that this is a question for the Council. However, the HBF considers that if appropriate sites are allocated and a Plan with viable and realistic policies is put in place that the home building industry should deliver the homes required.

6. *Has the Council been asked if it can accommodate any unmet housing needs from other LPA areas?*

6.1. The HBF considers that this is a question for the Council.

7. *For clarity for decision-makers, developers and local communities should the housing requirement for the plan period be clearly set out in the Plan?*

7.1. The HBF considers that the policy is clear as is set out at present. However, it may be beneficial for the overall number of homes to be provided within the policy or the justification text.

Issue 2: Affordable Housing

8. *Has the affordable housing need been correctly established, and is it based on up-to-date information?*

8.1. The HENA (2018) identifies an affordable housing need of 108 affordable homes each year for the first five years, and a potential surplus of affordable homes if considered over the entire plan period. The affordable housing need does not appear to have been updated within the 2021 HENA.

9. *Is the requirement in Policy CP4 for at least 20% affordable housing on sites of 10 dwellings or more justified by the evidence on affordable housing need and viability?*

9.1. The HBF have concerns that the Council's evidence does not justify the requirements for all developments of 10 or more dwellings to provide 20% affordable homes. Tables 7.1 to 7.14 of Section 7 of the Viability Study provides the Residential Viability Results, these clearly show the viability issues around the provision of the 20% affordable housing requirement. It highlights viability issues on primary sites at 30dph and 35dph on both greenfield and brownfield sites in the typical value and low value areas. These issues continue with increasing numbers of site typologies becoming marginal and unviable for the secondary sites, with the tertiary sites even showing marginal viability in the high value areas.

10. *Would it be deliverable on brownfield sites, taking account of the full range of development and policy costs? Is there justification for a lower affordable housing requirement for sites in the tertiary typology?*

10.1. The HBF considers that there is justification for a lower affordable housing requirement across the Borough and for there to be a differentiated lower or zero figure in specific areas. The Viability Study appears to show that there are consistently viability challenges within the low value areas, for tertiary sites and for brownfield sites, however, there are also challenges for some secondary sites, some typical value areas and some greenfield sites.

11. *The Housing and Economic Needs Assessment 2018 (E31) suggests a potential surplus of affordable housing in the longer term. Is this analysis robust? What are the implications?*

11.1. The HBF considers this is a question for the Council and their consultants.

12. *For clarity for decision-makers, developers and local communities should the need for affordable housing over the plan period be clearly set out in the Plan?*

12.1. The HBF considers that it would be beneficial if the affordable housing need was set out in the Plan along with details of the evidence base for this need.

13. *Is it clear to decision makers, developers and the community what the limited circumstances are where off-site provision via commuted sum may be appropriate?*

13.1. The HBF does not consider that it is clear to decision makers, developers or the community what the limited circumstances are where off-site provision via commuted sum would be appropriate.

13.2. The HBF is also concerned that the policy appears to state that the policy appears to suggest that affordable homes delivery is expected to be in accordance with the Council's Affordable Housing Guide for Developers SPD. This policy wording should not be interpreted by the Council's Development Management Officers as conveying the weight of a Development Plan Document onto this guidance, which has not been subject to examination and does not form part of the Local plan. The Town and Country Planning (Local Planning) (England) Regulations 2012 are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in policy in the Local Plan. To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Council's requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines set out in separate guidance.

Issue 3: Self and Custom Build Housing (SCB)

14. *What is the current demand for SCB homes in the borough? How has future demand been assessed?*

14.1. Figure 9 of the Council's Housing Topic Paper sets out the entries on the Council Self and Custom Build Register and identifies the planning permissions that have been granted for Self and Custom Build Units. It states that there were 47 entries on the Register at 30th September 2022, and that since 2020 48 units had been granted permission.

15. *Is it clear to decision-makers, developers and local communities exactly how many serviced plots are required over the plan period?*

16. *Is the provision of 8 plots allocated in site H068 sufficient to meet the identified demand over the plan period?*
17. *Is Policy CP4 effective in outlining how it would be implemented? Should the policy provide guidance on the potential future use of permitted CSB plots where there proves to be no demand?*

Issue 4: Housing for Older and Vulnerable People

18. Policy CP4 requires at least 20% of homes appropriate to accommodate the needs of older and vulnerable people in schemes over 10 dwellings. What is the justification for this threshold and would it meet the identified need over the plan period?

- 18.1. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, the HBF does not consider that the Council have provided sufficient evidence for this policy and this threshold to be considered justified or consistent with national policy.
- 18.2. The PPG⁷ identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The HBF does not consider that the Council have provided sufficient evidence for this policy to be considered justified or consistent with national policy. The HBF also does not consider that the Council has produced sufficient evidence to justify the requirement for developers to provide bungalows, or other homes that are deemed appropriate for the needs of older and vulnerable people.
- 18.3. However, it is noted that the Government response to the Raising accessibility standards for new homes⁸ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced. The NPPF⁹ confirms that Local Plans should avoid unnecessary duplication.

19. What evidence is there that this level would be viable?

- 19.1. As set out previously, the HBF have concerns around the viability issues and challenges that are identified by the Viability Study. The HBF is concerned that in low value areas and on tertiary sites that the Viability Study shows that when all policies are considered even without the affordable housing requirements these sites are not viable. This suggests that the M4 requirements are not necessarily viable in all cases.
- 19.2. The Viability Study does not appear to have considered the cost implications of providing bungalows within development. It has considered the 20% M4(2) requirement as per Policy DM3.

⁷ ID: 56-007-20150327

⁸ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

⁹ NPPF 2021 Paragraph 16f.

20. *Is there overlap and ambiguity between the requirements of Policy CP4 for at least 20% of homes to be appropriate to meet the needs of older and vulnerable people and the requirement in Policy DM3 to provide 20% of homes built to accessible and adaptable standard. Is it clear to decision makers, developers and the community what would be expected in new developments?*

20.1. The HBF is concerned about the clarity of policy CP4 and considers that there is overlap and ambiguity with the requirements of DM3. The HBF considers that it is not clear to decision makers, developers and the community what would be expected for new developments. The HBF considers that it is not clear if this requirements for 20% of homes to be appropriate for older and vulnerable people is in addition to the requirements of DM3 or whether the need to meet the DM3 requirements would be reduced if bungalows or other homes suitable for older or vulnerable people were provided.

21. *Is it clear how the policy would be implemented?*

21.1. The HBF does not consider that it is clear how the policy would be implemented as set out above.