

Development Plans Manager,
South Lakeland House,

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Kendal,

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Date: 5th January 2017

Email: developmentplans@southlakeland.gov.uk

Sent by Email only

Dear Sir / Madam,

Arnside and Silverdale AONB Draft Development Plan Document

1. Thank you for consulting with the Home Builders Federation (HBF) on the Arnside and Silverdale Area of Outstanding Natural Beauty (AONB) Draft Development Plan Document.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following brief comments.

Policy AS04: Housing Provision

4. The HBF supports the provision of housing within the AONB to meet local needs including affordable housing provision. The provision of affordable housing must, however, be balanced against the impact its delivery will have upon the economic viability of a scheme.
5. The policy requires at least 50% affordable housing provision from all new housing development. The HBF has a number of concerns with this policy requirement and considers it to be unsound as it is contrary to national guidance, unjustified and will not be effective.
6. The inclusion of the wording **at least** provides no certainty for the development industry and is likely to stall developments through protracted negotiations. The NPPF, paragraph 174, requires local authorities to;

“...set out their policy on local standards in the Local Plan, including requirements for affordable housing...”

7. The current policy does not set out a clear local standard. The Inspector of the Leeds Core Strategy noted in his report, dated 5th September 2014, that;

“...Paragraph 174 of the NPPF states that; ‘Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing’. With regard to affordable housing, these standards include the thresholds which trigger the requirement for affordable housing and the percentage target that will be sought. As submitted Policy H5 did not include thresholds or targets to guide the provision of affordable housing. Consequently, it did not accord with national guidance and was unsound...”
(Leeds Core Strategy Inspectors Report, paragraph 36).

8. It is also clear that to enable developers to assess site viability at an early stage affordable housing contributions should be set as maximum and not minimum requirements. The PPG is also clear that plan makers should not be planning to the margins of viability (ID 10-008). This policy would require this in every case. This was confirmed by the recent decision of the Inspector dealing with the Blackpool Core Strategy in his report, dated 23rd November 2015.

*“...However, it is not appropriate for the policy to refer to 30% as a “minimum” requirement (and at the hearings the Council indicated that this had not been the intention of the policy) and thus **MM17** which removes this word is necessary for the policy to be justified...”* (Blackpool Core Strategy Inspectors Report, paragraph 56).

9. It is therefore clear that the Councils must set out their policy target for affordable housing within the policy and this should be identified as a maximum requirement.
10. The policy also does not provide a threshold under which such affordable housing obligations would not apply. This is contrary to national guidance set out within the Written Ministerial Statement, dated November 2014, and the PPG (ID 23b-013). Within AONB the site size threshold for planning obligations is set at 6 units or more and on schemes of 6 and 10 units contributions should be sought in the form of cash payments which are commuted until after completion of units within

the development. The consultation document appears to completely ignore this issue and as such is unsound.

11. In setting an affordable housing policy the Council must have regard to the cumulative viability impacts of all policies and obligations (NPPF paragraphs 173 to 177). The HBF is aware of the 2016 *Arnside and Silverdale AONB DPD Viability Study* (Viability Study) undertaken by HDH Planning and Development on behalf of the two Councils. This document concludes at paragraph 9.18;

“...It is clear that the proposed 50% affordable housing target would not be deliverable.”

12. Table 9.3 illustrates that of the 9 sites tested 6 would be clearly unviable whilst the remaining 3 would be marginal at best. The proposed policy target is therefore unjustified and as such unsound.

13. Whilst the HBF agrees that the AONB should not be the location for significant amounts of housing it is important that local needs are met. Unfortunately the combined problems of conformity with national policy and viability implications means that this is unlikely to be the case and as such the policy would be ineffective. It is therefore recommended the policy requirements are reconsidered.

Policy AS16: Proposed Housing Allocations

14. Whilst the HBF does not wish to comment upon the acceptability or otherwise of the allocations it is noted that the plan only includes sufficient allocations for 74 dwellings. The HBF would not anticipate significant levels of development within the AONB, however, allocations for just 74 dwellings is unlikely to meet local needs over the plan period.

15. The level of allocations appears particularly low when it is considered that the area actually has a relatively significant population (circa 10,000) for an AONB of its size. Arnside also has a population of 2,235 at the last census, many of whom are ageing. It is therefore clear that new dwellings will not only be required to meet the needs of existing residents but also to attract new residents to the AONB to ensure it retains its vitality. Given this context it is unlikely that the allocation of just 74 dwellings would be sufficient to meet the current or future needs of the area.

16. Allocations provide certainty for the development industry and residents alike. This is important within any plan area but particularly so within the AONB. It is therefore recommended that further allocations are made in order to ensure that local needs are met and the AONB area can attract and retain residents to ensure it retains its vitality.

Information

17. I trust that the Council will find the foregoing useful. I would be happy to discuss the above comments in more detail if required.

18. The HBF would like to be kept informed of progress upon the Arnside and Silverdale DPD as well as any other planning documents. As the regional representative for planning issues across the north of England I would be pleased if you would ensure that my contact details are retained for such purposes.

Yours sincerely,



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