

Home Builders Federation

Matters 6, 9, 16 and 17

PETERBOROUGH LOCAL PLAN EXAMINATION

Matter 6 – General housing policies, inclusion affordable housing (policies LP8 and LP9, LP17)

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the provision housing and affordable housing.

1. Is there clearly evidenced need to apply the optional technical standards, in part? If so where is this set out?

The Council's paper on LP8 meeting housing needs provides its evidence base supporting the use of the optional technical standards with appendix 1 setting out the detailed evidence in relation to the need for the optional technical standards.

Whilst this evidence establishes that the Borough will, in common with the rest of the Country, an ageing population the evidence does not support the need for all new homes to be built to part M4(2). To begin with it must be remembered that all new homes will be built to part M4(1). As the Council note on page 11 of their evidence paper this standard allows most people, including wheelchair users, to approach and enter the dwelling and are able to access habitable rooms and sanitary facilities on the first floor. As such these standards are suitable for the vast majority of people over 65 who will have no mobility concerns. This position is supported by the Council's evidence which sets out that in 2035 there is expected to be 8,506 people over 65 who are unable to manage at least one mobility activity on their own – around 19% of this age group and nearly 4% of total population.

So, the ageing population itself is not an indication that all homes should be provided to M4(2). Looking further at the evidence of the data provided also shows that a considerable proportion of those aged over 65 and with a mobility difficulty are likely to be in specialist accommodation. Table 3 on page 14 of the Council evidence paper shows that there are currently 2,725 specialist homes for older people and 1,559 care homes. These will meet the needs of a sizable proportion of those older people with mobility difficulties mentioned above. In addition to these homes a further 6,980 existing homes will have been made accessible through the Disabled Facilities Grant



of other sources of funding. Given the importance attached to allowing people to stay in their own homes longer this will provide an important source of accessible home.

Therefore, we would suggest that the evidence does not indicate the need for all new homes to be built to the higher accessible standard. The higher levels of accessibility already provided for using par M4(1) will enable the majority of older people who choose to move to a new build dwelling to stay in their own home longer. Whilst we accept there may a proportion of new homes may need to be built to part M4(2) it must reflect the evidence of need not just because there is a growing number of people aged over 65.

2. Was the impact of the optional technical standards considered in the plan's viability assessment?

Yes. The impact of the higher standards is considered in section 3.5 of the Local Plan Viability Assessment (PE11ai). This evidence shows that each standard on their own is unlikely to have a significant impact, however, the report's author does raise the concern in paragraph 3.5.6 that the collective impact of these policies alongside those for affordable housing and the proposed rates of CIL does start to impact on scheme viability. Given, the concerns with regard to the cumulative impact of policies not only in relation to the technical standards but the potential for lower value areas to achieve the Council's 30% affordable housing requirement in paragraph 3.3.27 the Council will need to give consideration to a reduction in its requirements for Part M4(2) and M4(3).

4. Is the requirement for 30% affordable housing justified?

When considering the level at which affordable housing requirements, and indeed all policies that place an additional cost on to the developer, it is important to consider paragraph 10-008-20140306. The paragraph states:

"Plan makers should not plan to the margin of viability but should allow for a buffer to respond to changing markets and to avoid the need for frequent plan updating."

We would suggest that the evidence on viability published by the Council indicates that the Council's policy requirements mean that they are planning to the margins of viability. As highlighted above the Viability Assessment at paragraph 3.327 states that the 30% target for affordable housing will be "*challenging in a variety of circumstances*". The conclusions also set out in the following paragraph that the results indicate that this could means delivery discussions more usually in the 20% to 30% range. What the results of the viability assessment therefore suggest is that in order to be deliverable the Council will need to negotiate the level of affordable housing that can be provided and that this will be lower than the aspirational target of 30%.

Because of this, we welcome the inclusion on policy LP8 the clear commitment to negotiation where this policy will make a scheme unviable. However, this policy whilst examined under the 2012 NPPF will be delivered through the revised version of this

Framework published earlier this year. This place far greater emphasis in paragraph 57 on the local plan with regard to viability and the assumption that these requirements are viable. The evidence would suggest that the affordable housing requirement set out in policy LP8 is an aspirational one and that the level that can be viably delivered by development locally will be lower. This position would appear to be supported by the delivery of affordable homes. The 2017 Housing Development Report outlines that the proportion of affordable units to market units was 22.6% between 2011 and 2017. We recognise that this was in relation to all development but the same report shows that delivery was less than 20% of market homes 2012, 2014, 2016 and 2017 when delivery fell below 20% despite high overall levels of housing delivery. We would therefore suggest that the affordable housing target be lower to ensure that there is a buffer within the Council's policies to allow for changing circumstances and reduce the need for negotiation.

6. Are the higher access requirements of policy LP8 in the section entitled 'Dwellings with higher access standards' justified?

No. See response to question 1 and 2.

Matter 9 – Health and Well Being

Issue Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the matter of health and wellbeing.

Response to Questions 1 to 4.

We recognise the role that the local plan can have in ensuring that new development does not have a negative impact on the health and well-being of residents. However, we are concerned that policies such as the one being proposed by the Council effectively increase work for the applicant to show how the application of other policies in the local plan support health improvement. If the Council have prepared an effective plan that has considered the wider health and well-being issues arising from the development, it should not require developments to undertake a further Health Impact Assessment if it is in conformity with the Local Plan. Similarly, the requirement to provide developer contributions towards health facilities will be addressed through policy LP14 rather than a separate policy for health facilities.

We therefore suggest that the policy as it provides duplication with other policies in the local plan and as such is not an effective policy. The plan should have been prepared to support the health and well-being of the population without recourse to a specific policy on this issue.

Matter 16 – Objectively Assessed Needs for Housing Land

Issue - Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for housing land.

Response to questions 1 to 5

Whilst we raised concerns regarding the overarching approach taken in the SHMA, such as the use of a 10 year migratory trend and the limited response to market signals, in our submission we considered the final assessment of OAN to be a reasonable assessment of housing need.

Whilst we did not comment on in our representation is the need to ensure that the economic aspirations of Peterborough continue to be addressed in the OAN it is important to emphasise the importance of Peterborough ensuring that the jobs growth forecast for the area are adequately supported by the delivery of new homes. The need to ensure employment trends and housing provision together is set out in PPG. Paragraph 2a-017-20140306 outlines the requirement for Councils ensure that their housing requirement will not stifle jobs growth and reduce the resilience of local businesses or lead to unsustainable commuting patterns.

The Council have used the 2016 East of England Forecasting Model (EEFM) as the basis for their estimates of jobs growth and outlined that a housing requirement of 805 dpa would be sufficient to support expected levels of employment growth. However, the latest version of this model published in 2017 shows that the forecast jobs growth for Peterborough has increased. Figure 3.4 of the SHMA outlines that jobs growth in Peterborough between 2015 and 2036 was expected to be around 17,627 jobs. However the latest forecasts in the updated EEFM suggest that this growth will now be 22,900 jobs during the same period. The updated models also shows that by 2036 the Council will need to have a housing stock of 108,900 dwellings to support the forecast number of jobs. This would require a further 27,500 homes to added to the housing stock between 2016 and 2036. Whilst adjustments would need to be made for commuting rates and double jobbing there is clearly evidence to suggest that the Council many need to consider a higher overall level of housing delivery in order to support the expected rates of jobs growth in the Borough.

7. Is the Council's approach to dealing with the current unmet housing need in Fenland district justified and would it be effective?

It is important that the unmet needs arising from Fenland continue to be met by Peterborough and we are concerned that any separation of these from Peterborough's requirement could lead to these homes not being delivered. If circumstances change as a result of Fenland's local plan review we would suggest that the Council would need to undertake a partial review of its own plan to revise its housing requirement. It will be important that any revision to the housing requirement are made in this manner

as it affords the opportunity for all stakeholders to comment on any proposed amendments and have their concerns heard through an examination in public.

Matter 17 – The supply and delivery of housing land

Issue - Whether the approach towards the supply and delivery of housing land is justified and effective and consistent with national planning policy.

6. The Council have adopted the 'Liverpool' method for dealing with their previous undersupply (spread over the Plan period, rather than the first 5 years). Is this the correct approach given the circumstances in Peterborough?

No. PPG is clear that any undersupply should be addressed within the first five years of the plan where possible. Considering that the Council would have a five year land supply on adoption of the Local Plan if the Council were to apply the Sedgefield approach to calculating the five year land supply it would appear to be unnecessary. If the Council are concerned that in further they may not have sufficient supply in future it should seek to address this through additional allocations that will support delivery across the plan period.

8. What would the requirement be for a five year supply, including a buffer and accommodating any shortfall/oversupply since 2011?

The table below outlines our assessment of the Council's five year land supply from 2018/19 using both the Liverpool and Sedgefield methods and including both a 5% and 20% buffer. This is based on the Council's delivery expectations and stepped trajectory set out in E028 and E030.

	Liverpool method with 5% buffer	Liverpool with 20% buffer	Sedgefield with 5%	Sedgefield with 20%
Basic five year requirement 2018/19 to 2022/23	5235	5235	5235	5235
Backlog 2011/12 to 2017/18	151	151	543	543
total 5 year requirement 2018/19 - 2022/23	5277	5277	5778	5778
Buffer applied (5%/20%)	5541	6332	6067	6934
Supply 2018/19 to 2022/23	7454	7454	7454	7454
surplus/shortfall	1913	1122	1387	520

Years supply in first five years	6.73	5.89	6.14	5.38
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9. What are the implications of stepped delivery of housing on the supply and delivery of housing in the early and later years of the Plan?

The implications of the proposed stepped trajectory appears to reflect the expected higher rates of delivery during the middle period of the local plan. This will then place significant pressure to deliver within that time period rather than seek to deliver more homes in the earlier part of the plan period which would be the more robust approach. As outline in or comments on the use f the Liverpool method it is important that backlog is addressed within five years and the use of the step trajectory will mean that homes required now will not be met until later in the plan period.

10. What impact will this have on the 5 year supply of deliverable housing land and the delivery of affordable housing?

The step trajectory means that the Council will have a slightly improved five year housing land supply on adoption of the Local Plan.

11. Would the plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?

Our assessment of the Council trajectory is that the will have a five year land supply on adoption and in future – should all the sites come forward at the expected rates. Given the reliance on large scale strategic sites to meet needs in full, any uncertainty about overall delivery rates will need to be addressed through additional allocations of smaller sites that will complement the delivery of those strategic sites.

15. What are the main findings of the Viability Study? Has this work indicated that some types of site or uses are likely to be unviable? If so what impact will this have on delivery?

See response to Question 4 of Matter 6

17. What are the targets for the provision of affordable? What has been achieved in recent years?

See response to Question 4 of Matter 6

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