

Home Builders Federation

ID: 157

Matter 6

HART LOCAL PLAN EXAMINATION

Matter 6 – Affordable housing

6.3 Is Policy H2 justified and consistent with national policy?

No. The NPPF establishes in paragraph 17 and 154 the importance of the local plan setting out unambiguous policies that support predictable and efficient decision making. It is therefore essential that affordable housing requirements are set out as maximums not minimums as this provides the clearest indication as to how a decision maker should react with regard to this policy. It also ensures that applicants are confident that they will not be asked for a higher level of affordable housing requirement by the Council.

When considering this policy, it is also important to recognise that it will be implemented on the basis of paragraph 57 of the revised NPPF. This states that where an application complies with the development plan then it should be assumed to be viable. No further assessment of viability is required, and no additional provision of affordable housing should be sought by the Council. To provide the necessary clarity on this the Council should set out its requirement as 40% to ensure certainty for applicants as well as deliver consistent decision making in future that is compliant with the revised NPPF.

We would therefore recommend the following amendment to policy H2:

“On developments of 11 or more dwellings (gross), or of greater than 1,000 square metres gross residential floor space irrespective of the number of dwellings, the Council will require no less than 40% of the new homes to be affordable housing, to be provided in accordance with the following criteria...”

6.5 Policy H2 requires developments of 11 dwellings or more to make provision for ‘no less than’ 40% affordable housing units. Will the Council therefore seek more than 40%? If so, under what circumstances?



See response to question 6.3

6.6 Is Policy H2 justified, insofar, that it applies to specialist housing? Is this viable?

No. In our representations we were concerned that the Council had not considered the additional costs in the provision of special accommodation for older people – both C3 and C2 uses. We are, therefore, pleased that the Council has examined this issue in its addendum to the viability assessment (ECO3D). Appendix 4 of this addendum shows that the cost of providing 40% affordable housing is not a viable proposition for specialist accommodation. This evidence clearly shows that specialist accommodation should not be required to provide any on site affordable housing and even a financial contribution to such provision is not supported by the evidence. Even where there is a zero affordable housing requirement the residual land value is still below the lowest threshold land value for employment land in the Borough. Given that the provision of specialist accommodation is largely delivered in or near town centres this would suggest that the Council should amend H2 to exclude the requirement for specialist accommodation for older people to deliver affordable homes as set out in policy H2. We would recommend the following amendments:

- Include in policy H2 the sentence: “*Specialist and supported accommodation classified as either C2 or C3 are exempt from the provisions of this policy.*”
- Delete the final from paragraph 198 sentence.

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