

Home Builders Federation

Matter 9

NEW FOREST DISTRICT LOCAL PLAN EXAMINATION

Matter 9: Whether the housing policies are justified, effective and consistent with national policy

Relevant Policies: Policy 16, Policy 17, Policy 18, Policy 19 and Policy 20

Housing type, size and choice

9.3 In overall terms is Policy 16 justified, effective and consistent with national policy?

The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is effective and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements or the need to provide significant amounts of additional evidence. Paragraph 11 of the NPPF recognises this need for flexibility stating that plans should be “sufficiently flexible to adapt to rapid change”. Policies identifying a precise mix do not offer that flexibility and as such cannot be considered sound.

It is important to remember that whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations. So, whilst we support Council's in seeking to achieve a broad mix across the plan period this should not be translated directly into policy. It should be left for developers to supply the homes they consider are necessary to meet demand. The development industry understands what types of homes are needed to meet the demands of its customers, if it did not then the homes would not sell.

We would therefore suggest that the policy requires applications for housing development to have regard to the evidence on housing mix but that the final mix is left to agreement between the applicant and developer on a site by site basis. This would establish a flexible approach to housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Residential accommodation for older people

9.4 What is the evidence in relation to needs for residential accommodation for older people?



No comment.

9.5 Is the requirement in Policy 18 to provide self-contained homes to meet the needs of older people, including sheltered and extra-care housing on the strategic site allocations justified?

Whilst Strategic Site Allocations will contribute to the delivery of NFDC's housing needs, Draft Policy 18 (Residential Accommodation for Older People) fails to give regard to the delivery that windfall sites play in delivering this tenure of accommodation. The Plan requires housing delivery through windfall sites but omits the delivery of older persons housing through this form of delivery. Policy 18 is therefore inconsistent with other policies in the draft Plan in its current form.

C2 developments can be easily accommodated on Strategic Sites as the care needs required by the occupants relies upon the internal arrangement, facilities and care within the building. However, sheltered housing falling within Use Class C3 requires sites in sustainable locations to be successful. To achieve this, a Policy framework that supports development of such sites previously developed sites in sustainable locations is required. Previously developed windfall sites are deliverable in the short term and are required to deliver identified housing needs, in accordance with the delivery strategy of the draft Plan.

9.6 In overall terms is Policy 18 justified, effective and consistent with national policy?

Whilst we support policies that are supportive of deliver accommodation for older people it is important that the Council seek to allocate sites to meet their needs rather than require these on strategic sites (as detailed in response to 9.5). Sites must be identified to meet the needs of older people on sustainable sites close to the facilities needed to support this growing population and allowances should be made for windfall sites brought forward in excess of these allocations to assist in meeting identified needs. It is not sufficient to rely on allocated strategic sites that will not meet the specific locational needs of these communities.

Affordable housing

9.7 What is the evidence in terms of affordable housing need and what does it show?

No comment

9.8 What are the past trends in affordable housing in terms of completions and forms of delivery? How is this likely to change in future?

We note from the Council's Authority Monitoring Report that the Council has not delivered significant numbers of affordable housing through its current policy. In the latest annual monitoring report¹ published by the Council just 21 affordable homes were delivered (12% of overall completions). Such low levels of affordable housing delivery suggest that the Council's current requirements are potentially too high and that a lower requirement is necessary in this local plan to support delivery.

¹ <http://www.newforest.gov.uk/CHttpHandler.ashx?id=16590&p=0>

9.9 Is the site size threshold for seeking affordable housing in Policy 17 justified and consistent with national policy?

No comment

9.10 What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes? What does it show and does it justify the percentages sought in parts i and ii of Policy 17?

The Council's decision to vary its requirements based on geography is welcomed. However, we are concerned that the policy has not fully reflected the viability evidence provided by the Council. Whilst this plan will be examined under the 2012 NPPF it will of course be delivered under the 2019 NPPF which places far greater emphasis on viability having been considered at the plan making stage and indicates in paragraph 57 that decision makers should consider development that complies with policies in the plan to be viable. The aim of the approach set out in the latest NPPF is to reduce the number of applications where affordable housing requirements are negotiated.

It is therefore important that this plan does not seek affordable housing requirements that will inevitably lead to site by site negotiations. We are therefore concerned that the Council has chosen to ignore their own evidence with regard to small sites. The evidence indicates that such schemes are either marginally viable or will be made unviable by the Council's policies across all value areas. Such sites make will make an important contribution to the Council's delivery expectations and the Council should seek to encourage their delivery by reducing affordable housing requirements within the plan.

9.11 What is the basis for the tenure mix set out in part iii of Policy 17 and is this justified?

No comment

9.12 Is the policy sufficiently flexible in relation to viability and the potential for off-site provision?

The Council have stated that development viability will be considered in the application of this and other policies. It is essential that the Council is flexible in the consideration of all its policies to ensure that they can be off set where the make development unviable. However, as stated above, the Council should be looking to ensure that it reduces the need for negotiation at the application stage by setting policies that are unlikely to make development unviable, taking into account the following comments.

Older persons housing

Sub-text to Policy 18 (paragraph 6.29) requires affordable housing to be provided on-site and provides insufficient flexibility. Such affordable housing provision has proven to be incompatible with managed sheltered housing developments. This matter has been accepted in many developments in the NFDC area and tested at length at previous appeals. RSL's have also been found to be unwilling to take on any such units. The effect of this Policy would mean any sheltered housing development providing an off-site commuted sum towards affordable housing would be contrary to Policy. In turn, this would stifle delivery of sheltered housing accommodation. Such an approach conflicts with the positive approach towards housing delivery contained within the NPPF.

9.13 In overall terms is Policy 17 justified, effective and consistent with national policy?

No. We are concerned that the implementation of this policy will lead to the site by site negotiation of affordable housing requirements to ensure their deliverability. The Council should set reduced targets to secure the delivery of sites and limit the number of applications on which affordable housing requirements are negotiated in the context of the above comments.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E