

WARWICK DISTRICT LOCAL PLAN EXAMINATION

MATTER 12 – HOUSING POLICIES (H0 and H2 – H14)
Inspector’s Key Issues and Questions in bold text.

The following Hearing Statement is made for and on behalf of the Home Builders Federation (HBF) in regard to the Warwick District Local Plan. This Statement responds to selected questions set out in the Inspectors Matters & Issues document. The following answers should be read in conjunction with our representations to the Local Plan pre submission consultation ended on 27th June 2014.

Issue

Whether the housing policies are justified, effective and consistent with national policy.

Questions

Policy H0 – Overarching policy

1) Should it be amended to reflect the Council’s position in terms of accommodating unmet needs from other authorities? How could this be done?

Policy H0 should be amended to reflect meeting unmet needs from elsewhere in and beyond the Coventry & Warwick Housing Market Area.

Policy H2 – Affordable Housing

6) What is the evidence in relation to the need for affordable housing? What does this show?

The “Updated Assessment of Housing : Coventry & Warwickshire HMA” prepared by GL Hearn dated September 2015 (HO20PM) identified a need for 280 affordable dwellings per annum in Warwick representing 47% of OAHN in the District and 600 affordable dwellings per annum in Coventry representing 28% of OAHN in the city respectively.

7) What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes? What does it show?

The Council’s evidence on affordable housing viability assessment as set out in the DTZ Reports dated November 2011 (HO15) and May 2012 (HO16) is now somewhat out of date. These assessments provide no definitive conclusion on the percentage of affordable housing which is viable. The evidence demonstrated significant variations in viability across the District and it is suggested that a single District wide figure is not appropriate and a zoned approach with different affordable housing percentages by area would be more appropriate.

8) What is the basis for the requirement for a minimum of 40% affordable housing? Is this figure justified? Does it reflect evidence on viability? Is a single figure for the whole District appropriate and justified? Is there evidence to take a different approach?

The Affordable Housing Statement of Common Ground between Warwick District Council and Coventry City Council (see Table 1 of Appendix C of the Council's Matter 2 Hearing Statement) proposes a blended affordable housing provision of 40% to meet Warwick's affordable housing needs and unmet affordable housing needs from Coventry.

As outlined by the Councils the relationship between affordable housing need and delivering affordable housing to meet that need especially via a re-distribution of unmet needs from one authority to another is complex. Therefore Table 1 in the Statement of Common Ground is only illustrative. Indeed viability constraints on development in Coventry mean affordable housing delivery in the city will be less than 28% so a higher proportion of Coventry's unmet needs are for affordable housing than illustrated. However a higher affordable housing provision in Warwick to meet this unmet affordable housing need would also be unviable. Therefore it is inevitable that some affordable housing needs will remain unmet.

9) Should the policy be worded to reflect the fact that provision of affordable housing is achieved through agreement or unilateral undertaking? i.e. should it refer to affordable housing being sought?

The wording of Policy H2 should be modified to refer to affordable housing provision "being sought".

10) In light of current national policy (following the Court of Appeal judgement in May 2016) are the thresholds of 10 and 5 dwellings appropriate and consistent with national policy?

The thresholds are not appropriate therefore Policy H2 should be modified to be consistent with national policy.

11) Is the policy sufficiently flexible, particularly in terms of the effect on viability and the potential for off-site contributions?

The policy provides flexibility by allowing negotiation on unviable schemes however the cumulative impact of policy expectations should not be set so high that development is threatened and the majority rather than the minority of development schemes are individually negotiated.

12) Is the policy consistent with national policy in relation to the definition of affordable housing and the type of provider?

Bullet Points (v) and (vii) of the Policy are more restrictive than national policy.

Policy H4 – Securing a mix of housing

16) Is part 2 of the policy appropriate in light of the new National Technical Standards and Building Regulations? Is the approach justified?

Policy H4 requires 10% adaptable homes on strategic sites. The Written Ministerial Statement dated 25th March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the NPPG. The Council’s evidence as set out in the SHMA is insufficient to justify the Council’s proposed policy requirement. If it had been the Government’s intention that generic statements about an ageing population justified adoption of the higher optional standards for adaptable / accessible dwellings then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. Therefore it is incumbent on the Council to provide a local assessment evidencing the specific case for Warwick which justifies the inclusion of 10% adaptable homes on strategic sites in Policy H4. It is also suggested that the reference to Lifetime Homes in para 4.51 should be deleted.

Policy H10 – Bringing forward allocated sites in the Growth Villages

24) What is the basis for the phasing approach set out in criterion c)? Is it justified and consistent with national policy?

A phasing policy is not justified and it is inconsistent with national policy. The fundamental thrust of Government policy is the need to boost significantly the supply of housing. Under the NPPF the requirement to meet the full objectively assessed needs for market and affordable housing is an absolute one except insofar as there is any inconsistency with other policies set out in the NPPF. The phasing proposal in Policy H10 imposes a timing restriction on the meeting of housing needs. The Council has not demonstrated that housing needs are less at specific times during the plan period indeed such proposed phasing will worsen affordability and rates of development trends in these growth villages. For sites larger than 50 dwellings it is not practicable for housebuilding companies to develop 50 dwellings then move off site for a period of time only to return at a later date to complete the remaining dwellings. Such a proposal has logistical as well as financial implications for the housebuilder. Therefore criterion (c) of Policy H10 is considered unsound by failing to be positively prepared, justified, effective or consistent with national policy.

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