



Acres Land & Planning Ltd

'Acres of space'

British & Continental Co. Ltd
Respondent No. 1045
Matter 2(iv): Housing

DERBY CITY LOCAL PLAN PART 1: CORE STRATEGY EXAMINATION

Main Issue 2(iv) - Whether the Local Plan makes appropriate provision for a range of housing in terms of affordability, mix and type (Policies CP7, CP8)

a) Does the Local Plan provide sufficient guidance on the mix, size, type, tenure and range of housing that is required?

Yes. We are satisfied that Policy CP7 on Affordable and Specialist housing covers the range of housing which will be needed. However, it does not appear to include starter homes which are now considered integral to the portfolio of housing provision needed.

b) Have the requirements in terms of the threshold and percentage for affordable housing in Policy CP7 been justified by the evidence base?

No. We have not seen adequate justification to support the 30% target quota.. The Council has undertaken Viability work but this only supports a maximum 30% target (with brownfield sites tending to support less affordable housing). In practice however we have found that the Council are prepared to be flexible in looking at both the proportion and mix of affordable housing – and this will need to be the approach if the quota is set at 30%. It should be emphasised however that the higher the target, the less will be the incentive for developers to bring forward sites in the City and the more difficult it will be to achieve the overall housing target. The aim should not be to hit the critical tipping-point of viability, since this will not compensate for the risk of pursuing a housing scheme in the first place. The 15 dwelling threshold is justified in para 7.16 of the Interim Housing Position Statement.

c) Are the indicative targets for the size split and the approach to affordable housing tenure justified and appropriate?

It is helpful for LPA's to give guidance as to what they feel is needed in the locality, but these should not become prescriptive requirements, whether in the form of tenure mix or house sizes. Different sites will be more appropriate for different types of affordable housing stock and some sites, by Registered Providers, may be 100% affordable and can be more closely tailored to known housing needs.

d) Has the effect of affordable housing provision on the overall viability of development been appropriately considered?

No. See response to b) above.

e) Do changes in the level of social rent announced in the Summer Budget of 2015 have any implications for the viability of development?

Yes. The budget changes involving the reduction in rental income announced in the Summer Budget 2015 will have critical implications for the viability of development. This will be reflected in two ways:- firstly, in the ability of individual tenants to pay (unless their whole rent is covered by housing benefit) which may make housing slightly less affordable and secondly, on the willingness of Registered Providers to embark on new schemes which are supported by capitalised rental income. This will obviously be reflected in lower transfer values offered by RP's to developers for social rent affordable housing.

f) Do the other requirements of Policy CP7 accord with national policy? In particular, is the provision for Lifetime Homes and wheelchair adaptable dwellings appropriate in the light of national policy following the Housing Standards Review and the Written Ministerial Statement of March 2015?

We understand that the changes introduced as a result of the Housing Standards Review remove the 'requirement' for lifetime homes and wheelchair accessible homes and that this needs to be properly evidenced by the local authority prior to it being incorporated into local plan policies. It is worth mentioning that whilst Lifetime Home standards are often welcomed by those people requiring extra facilities, they need to be paid for (through higher building costs and slightly lower densities) by all occupiers of Lifetime Homes, whether they need the facilities or not. It is often more efficient for the facilities to be provided where and when they are needed.

g) Does the Local Plan appropriately address the need for starter homes?

No. it doesn't. But the Government policy for starter homes is emerging 'as we speak' so that the new definition of affordable housing and the outcome of the recent Government consultation (23rd March 2016) on starter homes, will need to be incorporated at the Main Modifications stage (if the Local Plan progresses towards adoption). In practice however, we have found the Council amenable to introducing the option to include an element of Starter Homes as part of the Section 106 agreement on the Acorn Way/Derby Road site.

h) Does the Local Plan give sufficient encouragement to people wanting to self-build?

Yes. The potential provision and encouragement of Self-build housing is referred to in Policy CP7e) and is also discussed in the Derby Interim Housing Position Statement.

i) Does the Local Plan appropriately address the need for student accommodation?

The Council should not count institutional student accommodation as C3 residential.

John Acres

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