



**Derby City Local Plan Part 1: Core Strategy Examination
Matters, Issues and Questions**

HEARING STATEMENT

MATTER TWO (iv) HOUSING

***Main Issue - 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?***
- b) ***Have the requirements in terms of the threshold and percentage for affordable housing in Policy CP7 been justified by the evidence base?***
- c) ***Are the indicative targets for the size split and the approach to affordable housing tenure justified and appropriate?***
- d) ***Has the effect of affordable housing provision on the overall viability of development been appropriately considered?***

It is clear that the Plan could require a wide range of housing needs to be met through new development, and that this would require provision of a range of housing types and tenures. However, even where it seems that the SHMA provides evidence regarding the specific types of need clear guidance as to the requirements is not provided in all cases. For example, the evidence base (2013 SHMA Update – document CD020) identified a significant need for Intermediate housing, which appears to be higher than the need for ‘affordable rent’ properties. This is not translated into the policies which remains open-ended with regard to the likely tenure mix, and refers to negotiation on a site by site basis informed by the latest SHMA or other relevant evidence.

Directing users of the Local Plan to the most up to date evidence is sound in many respects. However, given some of the information which is not included in the draft policy – for example, details of the expected tenure split – it is notable that the text supporting policy AC7 includes reference to unit sizes (numbers of bedrooms). Albeit presented as indicative, it is to be expected that these needs will also change across the City over time, so the inclusion of Table 3 seems anomalous with the overall approach which seems to avoid including specifics which might soon be out of date or superseded by new data or evidence over the plan period.

Some further guidance and certainty would be welcome with regard to some housing need issues. For example, paragraph 5.7.22 (policy AC7) refers to the potential for “*smaller sized market homes*” to help meet the needs of couples wishing to ‘downsize’, or to meet the needs of single people. The plan is clear that this could help to rebalance the housing stock, and it is reasonable to assume that any rebalancing would help to improve the performance of the housing market overall. How any such provision is to be factored into the wider contribution towards meeting housing need remains unclear, as is any clarity on the most appropriate sources of evidence or guidance as to the need for smaller market homes. It is therefore difficult for developers to have any confidence that they understand what is required by way of the housing mix, nor how judgements about all of the various potential requirements will be determined.

It is appreciated that the plan is strategic in nature, and seeking to provide guidance which will remain valid and current for a number of years, and a flexible approach (including with regard to viability) is generally welcome. However, where possible the Plan ought to clarify matters such as the required (or likely) mix of ‘specialist’ housing, as not doing so can store up arguments and increase the potential for abortive work.

To maximise the clarity and certainty, it is important that if policies do not provide clear or specific guidance themselves that it is clear where the guidance or evidence to underpin future judgements and decisions will be found.

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

The relationship between ‘starter homes’ and other forms of ‘affordable housing’ is not clear. There are references to smaller homes in the context of affordable housing provision (para 5.7.8), and to smaller market homes (in para 5.7.22), but it is not clear how – or if – either relates to the emerging national ‘starter homes’ policy initiative.

The focus of the references to the smaller market homes are to the needs of couples wishing to downsize (presumably from a family home), and to meeting the needs of single people which would reasonably include, but is not necessarily limited to, younger people and first time buyers. This latter category of need could fit well with the national emerging 'starter home' initiative.

Bloor Homes remains of the view that this is an area where further guidance is required. We believe that to ensure flexibility, and where supported by appropriate evidence, provision of starter homes should be taken into account as part of the affordable housing 'mix'.