

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****Matter 5: Specific Housing Needs and Generic Housing Policies****Issue 1: Housing Mix (Policy HP2)**

1.2 Is the requirement for developments to provide 20% of housing for older people and with restricted mobility justified?

- 1.1.1 The ageing demographic profile of the Borough is widely acknowledged. As such there is a need for the Council to ensure that the future housing land supply is sufficiently responsive to this housing need to respond to the requirements of Paragraph 50 of the NPPF. Regarding Policy HP2 of the Local Plan, our Client's concern is not with the requirement made for adaptable housing, but rather how the policy requirement of 20% relates to supporting evidence, and how effective the provision of adaptable housing will be in responding to this housing need.
- 1.1.2 There is no assessment of specialised housing needs contained in any of the Addendums to the SHMA. As a result, in order to understand the housing needs of the ageing population reference is required to the 2014 Fylde Coast SHMA. The Fylde Coast SHMA identifies that the population of Wyre aged 65 and over will increase in the Borough by 30%. This is set against the context of overall population growth of 3%. Clearly substantial change is predicted to occur to the demographic profile of the Borough during the plan period.
- 1.1.3 The Fylde Coast SHMA is based on evidence from 2013 (now 5 years old) and as such is unlikely to remain up-to-date. Whilst our Client does not question that the headline issue of an ageing demographic in Wyre, there is a need to update this evidence base to ensure that policy is sufficiently reflective of this housing need.
- 1.1.4 The Council should gain a better understanding of where the growth in elderly population originates from. Is this growth as a result of the existing population ageing and living longer, or is it a greater influence of inward migration? This is not assessed within the supporting evidence. Gaining an understanding of this is important as much of this need may already be housed within the Borough, and as such new provision of adaptable housing stock may not be the most effective policy for the Council. Instead, there may be a need for alternatives

such as encouraging C2 type provision, or schemes which encourage people to alter their own homes.

- 1.1.5 Without the above information it cannot be confidently concluded whether a 20% requirement for sites of 20 dwellings to be adaptable in response to these needs is justified or effective in responding to housing need. Alternative approaches may be more effective, however further information to gauge a better understanding on this matter is first necessary.
- 1.1.6 Our Client is concerned that the Council is advancing a solution to this issue which effects development viability which may not be effective in addressing the identified problem. In parallel the Council does not propose to meet its affordable housing needs in full, appearing to accept this failure in supply terms despite its important status within national planning policy.

1.2 Does the wording of Policy HP2 allow for sufficient flexibility taking into account viability considerations and different needs across the District?

- 1.2.1 There is little flexibility within the Policy to enable a departure from its requirements where justified by site specific considerations. The Policy indicates that all developments of 20 dwellings or more should respond to its requirements. Under this wording the failure to meet these requirements would represent a departure from the development plan requiring the decision maker to refuse unless there are sufficient site-specific material considerations. This position substantially increases the risks to applicants for applications which fail to respond to this policy requirement will be refused.
- 1.2.2 The Policy as drafted risks the deliverability of housing within the plan area due to its effects on viability. The Council has assessed the impact of Policy HP2 on the commerciality of developments through its Viability Assessment. The assessment of Policy is based on the cost associated with developing buildings in accordance with Building Regulations M4 (2) and M4 (3A). Whilst our Client considers this to be a sensible assumption, the standards required of the Council to adhere to Policy HP2 is not outlined. As a result, the policy is silent in how developments are to accord with its requirements. This introduces unnecessary uncertainty for applicants and leads to increased unassessed costs if a different standard is applied. The Council should clarify this matter.
- 1.2.3 Taken the above as read, the Viability Appraisal clearly illustrates that in parts of the Borough (namely Fleetwood), the delivery of Policy HP2 requirements in relation to elderly/specialised housing provision would not be possible without significant risk to viability of development.

On account of this, it is clear that the Policy does not reflect supporting evidence, and in parts of the Borough, its application will challenge development viability. As such there is need for flexibility in the policy.

- 1.2.4 The Viability Appraisal is based on assumed inputs and characteristics across a fixed sample of sites and as such may not reflect all instances across the Borough. The potential for variance from these conditions on a site by site during the plan period further demonstrates the need for flexibility within the Policy.
- 1.2.5 In response to the above, there is need for the Policy to be flexible in its requirements, allowing for negotiation if necessary based on site specific evidence. The amendment of this policy to account for site specific viability will ensure that this part of the Policy is consistent with Paragraph 173 of the NPPF.

Issue 2: Affordable Housing (Policies HP3 and HP7)

2.1 Are the requirement for the levels of affordable housing within Policy HP3 justified?

- 2.1.1 The most recent assessment of OAN, provided by the Addendum II Report (September 2017), illustrates an affordable housing need of 134 dwellings per year for the next five years and 189 dwellings per year thereafter. As such, adopting the proposed housing requirement of 411 dwellings per year, the affordable housing needs of the Borough represent 32-46% of future housing need. Whilst efforts should be made by the Council to respond to this housing need, this must be balanced against viability in order to ensure a deliverable Local Plan.
- 2.1.2 The Council's submitted viability evidence illustrates a range of housing markets across the Borough. Differences in overall value of property affect the scope for developments in these areas to respond to financially linked policy requirements. Policy HP3 recognises this variation, and the effects on margins the type of sites have, and in response sets affordable housing requirements which vary based on geography and type of site. Based on this context, our Client considers that the approach of Policy HP3 is justified.

2.2 Do the requirements of Policy HP3 relating to viability (Section 3) and financial contributions (Section 4) provide sufficient flexibility?

2.2.1 Policy HP3 enables delivery off-site, and negotiation of requirements on a site by site basis. This introduces some flexibility within the policy to ensure that the viability of development is protected where evidenced to site specific conditions.

2.2.2 Our Client requests that the policy is amended to allow for renegotiation on permitted schemes in relation to affordable housing provision, should unforeseen changes occur post consent which may challenge scheme deliverability.

2.2.3 Beyond this, Our Client requests that the Council ensure that the viability evidence underpinning the Local Plan is kept up-to-date, with policy revised accordingly should prevailing market conditions change.