

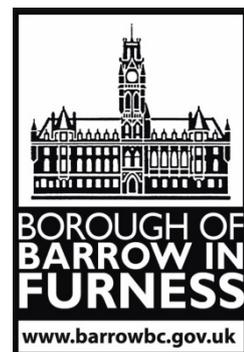
Barrow Borough Local Plan Examination

Hearing Statement Matter 7:

Housing Policies

Barrow Borough Council

May 2018



Inspectors MIQ's:

Matter 7: Housing policies

Issue

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

Relevant policies: H14

Questions

Policy H14: Affordable Housing

1. What is the evidence in relation to the need for affordable housing? What does this demonstrate?
2. What are the past trends in delivery of affordable housing and how it been delivered? Is this likely to change in the future?
3. What is the evidence in relation to the effects on scheme viability of delivery affordable housing as part of market housing schemes?
4. Should the policy be worded to reflect the fact that provision of affordable housing is achieved via the mechanism of agreement or unilateral undertaking? In other words, should the policy refer to 10% provision of affordable housing being sought?
5. Is the policy sufficiently flexible, not only in terms of taking into account viability considerations, but also in relation to any potential for off-site contributions?
6. Are the policy requirements justified and is the policy otherwise effective and consistent with national policy?

Policy H7: Windfalls

7. Is the policy effective and justified?
8. Where is the 'urban area' as referred to in criterion (a) defined?

Policy H9: Housing Density

9. Is the policy effective and justified?
10. Should a target minimum density be included?

Policy H11: Housing Mix

11. Is the policy effective and justified?

12. Would the policy deliver an appropriate mix of dwellings? In particular, is a more targeted approach, with an emphasis on delivering a greater proportion of family housing justified by the evidence and the nature of the existing housing stock?

Council Responses:

Issue 7 Housing Policies

Question 1 Response:

1.1. Evidence regarding affordable housing need is contained in the 2016 Strategic Housing Market Assessment (EL1 011) produced by Arc4 (Chapters 6 and 10 in particular). A summary of the need figure identified is also included in the 2017 SHMA Addendum (EL1 012) (paragraphs 4.27-4.31).

1.2. The evidence uses data gathered from the Household Survey carried out in 2013 and projects affordable housing need over the 2016/17 to 2020/21 period. The 2016 SHMA (EL1 011), Appendix C discusses the methodology used in more detail, stating

“Analysis has carefully considered how housing need is arising within the Barrow in Furness Borough identifying existing households in need (and who cannot afford market solutions), newly-forming households in need and existing households likely to fall into need.

This has been reconciled with the supply of affordable dwellings which considers location, size and designation (i.e. for general needs or older person). Based on the CLF modelling process, analysis suggests that there is an overall net annual imbalance of 101 dwellings. Any additional newbuild figures would reduce this figure.”

1.3. In summary there is a need for 101 net affordable dwellings per year over the period 2016/17 to 2020/21 (Table 10.7 of the SHMA 2016). The Household Survey identifies tenure preferences of existing households in need and newly-forming households, with 72.4% requiring social/affordable rented homes and 27.6% intermediate tenure.

Question 2 Response:

2.1. Past trends in affordable housing provision are shown in the table below

Affordable Housing	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17
Total Completions	26	-1	1	6	53	16	4	12	15	0	0

2.2. The issue of delivery of affordable housing is discussed further in Sections 1.225-1.2210 of the Housing Land Supply and Need Topic Paper (EL1 013). Currently affordable housing is provided on an ad-hoc basis through negotiations with the Council, Developers and registered social landlords. The proposed Affordable Housing Policy will result in an increase in affordable housing provision in the Borough, however such negotiations will still continue in order to try and encourage a greater provision of affordable housing (e.g. a greater % on larger sites than the 10% required and provision on smaller sites where possible).

Question 3 Response:

3.1. A Local Plan Viability Study (EL6 001) was produced by Keppie Massey and WYG in 2016 which considers the effects of the affordable housing requirement on scheme viability as well as the cumulative impact of other contributions. At the time of the Study, the draft affordable housing policy (H14) did not require a specific percentage of affordable housing (see paragraph 2.70 of the Study). Testing was however undertaken on the basis of both 10% and 20% affordable housing provision on sites over 10 units, assuming a mixture of affordable rent and intermediate tenures (see Table 3.14).

Question 4 Response:

4.1. The Council considers that 10% affordable housing provision should be sought where this does not render a site unviable. The Local Plan Viability Study (EL6 001) states that such a requirement may render some sites within lower value areas, therefore the policy allows consideration of lower percentages where this is the case, however 10% provision will be achievable in most cases.

Question 5 Response:

5.1. The policy is sufficiently flexible as it accepts that in certain cases a lower proportion of affordable homes will be accepted where the 10% provision would render a scheme unviable.

5.2. The cumulative impact of off-site contributions and affordable housing provision was taken into consideration when producing the Local Plan Viability Study (EL6 001). The Council would accept a main modification to the policy which states the *“a financial appraisal that the development would not otherwise be financially viable, either because of the requirement for 10% affordable housing or because of the cumulative impact of the requirement for affordable housing and other contributions.”* (new wording added in italics)

Question 6 Response:

6.1. Yes, the policy will be effective as it will help provide additional affordable housing in the Borough and complies with paragraphs 47, 173, 174 and 177 of the NPPF.

Question 7 Response:

7.1. The Council requests a main modification to Criterion a of Policy H7 replacing the phrase “urban area” with “built up area”. Please see the Council’s response to Matter 3a, Q7. Such an amendment would ensure the policy is effective and justified.

Question 8 Response:

8.1. Please see the Council’s response to Matter 3a, Q7.

Question 9 Response:

9.1. The Policy is effective and justified. Please see the Council’s response to Matter 3a, Q5.

Question 10 Response:

10.1. A target density should not be included. Requiring a minimum density on each site could undermine regeneration efforts and hinder the Council’s attempts to increase housing mix and choice. A sufficient number of developable sites have been identified to meet the housing requirement over the full plan period without requiring high densities on future development sites. Please also see the Council’s response to Matter 3a, Q5.

Question 11 Response:

11.1. The intention of Policy H11 is to guide developers to build the types of homes that the Borough needs rather than what is the most profitable. Directing them to the most up-to-date evidence documents (i.e. the latest SHMA – EL1 012) is a more flexible approach than listing specific house types required in the policy to any future changing needs. The 2014 SHMA (EL4 007) and subsequent updates use evidence from the 2013 Household Survey. The results show that there are three key dwelling types particularly required across the Borough; 3 bedroom houses, 1-2 bedroom houses, bungalows, flats and four bedroom houses (SHMA 2016 – EL1 011, pages 12 to 13). The SHMA also identifies “*a need to continue to diversify the range of older persons’ housing provision.*” (page 13)

