

HEARING STATEMENT

MATTER 8: DELIVERING THE RIGHT HOMES

BLOOR HOMES LTD, CAMERON HOMES LTD, LOVELL HOMES LTD, FOUR ASHES ROAD LTD

1. ISSUE

Whether the Plan has been positively prepared and whether it is justified, based on up-to-date and reliable evidence, effective, consistent with national policy in relation to local housing needs.

Question 2: In terms of Policy HC1:

a. What is the basis of this policy approach?

- 1.1 The basis of the policy reflects evidence set out in the Housing Market Assessment Update 2024, which forecasts a change in household composition within the District; reflecting an increase in one and two person households to 2040.
- 1.2 The policy approach seeks to re-balance the housing stock at 2040 to reflect the forecast housing composition through policy intervention. However, it is contended that the open market mix would be more appropriately addressed through market signals

b. Is it justified and consistent with national policy?

- 1.3 National policy states that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community. Paragraph 63 of the NPPF states that within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 1.4 Whilst the benefits of identifying specific requirements for affordable housing, specialist housing and travellers are accepted, it is considered that open market housing policy interventions are not justified. Requirements in respect of affordable housing, specialist housing and Travellers are dealt with via separate policies.
- 1.5 The evidence set out in the SHMA is 'needs' based. Open market demand doesn't just reflect need and will be subject to a range of lifestyle influences that go beyond the number of bedrooms required to accommodate household size. For example, the need for a home office, a spare bedroom to accommodate family and friends or flexibility to allow for changing household size over time.

c. What evidence is there to support the policy requirement that on major housing development sites the market housing must include a minimum of 70% of properties with 3 bedrooms or less?

- 1.6 The evidence set out in the HMA is not conclusive. The methodology of the demand model is driven by changes projected to the composition of the population over a 22 year period, utilising data from the 2010 Census. It should be recognised that needs will change over the Plan period and across the broad geographic area of South Staffordshire.

d. Is the policy effective in explaining the circumstances that will lead to the refusal of planning permission.

- 1.7 No, particularly as the policy requires the specific mix breakdown to be determined on a site-by-site basis.

- 1.8 Whilst the policy requirement for a minimum of 70% of open market properties to comprise 3 bedrooms or less provides a hard policy line, recent experience has demonstrated minimal flexibility by SSDC on other elements of the open market mix. In many cases there is an expectation from the Council that not only are 4+ bedroom properties capped at 30%, but all other open market properties provided must also fall in line with the percentage breakdown for the relevant sub-area outlined in the HMA.

e. Is the policy sufficiently flexible?

- 1.9 The Council's interpretation of the policy results in a particularly prescriptive approach to housing mix at the development management stage that provides insufficient flexibility. Flexibility is also further diminished through interpretation of other Policies within the plan requiring bungalow (10% ask across all tenures) and M4(2) and M4(3) provision. Collectively, the prescriptive approach allows little influence for market signals or differentiation between proposals across the District.

g. Are any modifications necessary in the interests of soundness?

- 1.10 The policy should remove reference to a minimum of 70% of properties with 3 bedrooms or less. As the Local Plan includes minimum density requirement of 35dph and space about dwellings standards, there can be a level of certainty that a mix of sizes will be delivered across all site allocations.

Question 4: In terms of Policy HC3:

f. Are the expectations in terms of mix and tenure clearly set out in the policy?

- 1.11 The expectations in terms of tenure are clearly set out in policy, however mix is dealt with through Policy HC1. Policy HC1 requires the specific affordable mix

breakdown to be determined on a site-by-site basis which provides little certainty.

h. What evidence is there regarding the viability of delivering the policy requirements as part of market housing schemes. What does it show, and does it include an assessment in the context of other planning obligations and differing market conditions? Are the policy requirements justified in this context?

- 1.12 The Stage 1 Viability Study [EB41] determined the current affordable housing requirement of 40% provision is very unlikely to prove supportable on larger schemes with significant infrastructure costs and confirmed that affordable housing provision within the range of 20-30% is 'potentially relevant to strategic sites overall assuming a maximum of £9,200/dwelling S106 costs and no additional CIL contribution.
- 1.13 The Stage 2 Viability Study [EB40] provides updated assumptions for sites, including the two Strategic Development Locations. For Land East of Bilbrook the appraisal assumes approximately £14,000/dwelling S106 burden.
- 1.14 Following application submission, the current financial contribution ask is over £13.25m which equates to approximately £17,700/dwelling S106 burden. This is higher than the assumption contained within the Viability Study. In addition, it should be recognised that whilst this Local Plan is being assessed against the NPPF 2023 the site, through any application, will need to apply the 'Golden Rules' in respect of the Green Belt release element. A 15% uplift on the affordable housing element within the Green Belt element would result in a blended requirement of approx. 36% affordable housing provision across the site as a whole. At present there is no mechanism to run a financial viability assessment in respect of the 'Golden Rules.'
- 1.15 In respect of Land at Landywood Lane (Ref: 1360 the Stage 2 Viability Study concludes that a 30% affordable housing outcome may be challenging to overcome. The recently submitted application is accompanied by a financial viability assessment that will be subject to independent testing.

k. Are any modifications necessary in the interests of soundness?

- 1.16 Prior to determining the need for modifications, it is considered necessary to update the Viability Study a 2025 base date and to factor in up-to-date S106 costs to determine whether the 30% affordable housing requirement is viable.

Question 5: In terms of Policy HC5:

c. What evidence is there to justify the requirement that 100% of market and affordable housing must meet the higher access standards Part M4(2) Category 2: Accessible and adaptable dwellings of Building Regulations.

1.17 The evidence contained within the HMA 2022 [EB27] provides evidence that, in general, South Staffordshire has an older age structure compared to the wider region and the older person population will increase over the Plan period as with all areas. Evidence identifies a need for 2,172 accessible and adaptable general homes for those over 65 and 851 for those under 65 to 2040. These figures are not updated in the HMA 2024 Update.

1.18 Whilst there is evidence to justify implementing optional M4(2) standards, the evidence does not support the 100% requirement, especially when the policy seeks to establish an additional requirement for meeting the needs of older and disabled people.

e. Is the policy sufficiently clear on whether, or not, all 4 types of housing to meet the needs of older and disabled people are required on major housing development sites?

1.19 The policy is not sufficiently clear. If the Strategic Development Locations are providing specialist older persons accommodation, it would be unreasonable to require an additional provision of bungalows or other forms of specialist accommodation within the site. For example, the Land East of Bilbrook scheme proposes the delivery of up to 75 specialist older persons housing units which equates to approx. 10% of the overall provision. This aligns to the current 10% bungalow request at present at the application stage in South Staffordshire.

1.20 Whilst the Council currently requests 10% bungalow provision on all major housing sites (across all tenures) the quantum of provision is not set out in Policy HC4. In addition, the current request for 10% bungalow provision does not appear justified if all homes are to be built to M4(2) Category 2 accessible and adaptable standard. M4(2) dwellings are described as making “reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users.”

g. Are any modifications necessary in the interests of soundness?

1.21 Modifications are necessary to reduce the M4(2) requirement in light of published evidence and to provide greater certainty as to the form and quantum of specialist housing that should be provided within major housing sites.

