

Home Builders Federation

Matter 5

DOVER LOCAL PLAN EXAMINATION

Matter 5 – Type and Mix of Housing

Issue 1 – Affordable Housing and Viability – Policy SP5

Q1 How was the Dover Urban Area defined for the purposes of Policy SP5? Does it reflect the evidence in the Whole Plan Viability Study and Viability Study Update Note?

The HBF is supportive of the Council's decision to vary the affordable housing policy recognising the challenging viability scenario facing the Dover Urban Area. However, as stated in our representations we would have expected this to have been extended to other low values areas where, as stated in the Viability Update Note "... even with increases in sales values relative to development costs the delivery of sites in this area is likely to remain challenging". Given that some of these lower value areas are adjacent to wider Dover area consideration should have been given to extending the area where affordable housing is not required to be delivered.

Q2 How will affordable housing be delivered in the Dover urban area as a result of Policy SP5?

For Council

Q3 Are the assumptions regarding infrastructure and Section 106 costs in the Viability Study Update Note still broadly accurate following updates to the IDP? What implications, if any, does the latest evidence in the IDP have on the viability of residential development and the ability to deliver affordable housing?



For Council

Q4 Based on the requirements for qualifying developments, how many affordable homes is the Local Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?

For Council.

Q5 What is the justification for the suggested changes to Policy SP5? Why are they necessary for soundness?

The HBF do not support amendment AM14 which reinforces that specialist accommodation for older people such as retirement housing will be required to meet policy SP5 despite the viability evidence suggesting that for most areas of Dover this will render such development unviable. The Council has ignored the advice of the viability study which states at paragraph 10.83 to 10.85 that in the case of Sheltered housing, the appraisals produced a residual value that is over the BLV at 30% Affordable Housing on greenfield sites, but only 5% on brownfield sites. For extra care housing the evidence was even more stark with these not being able to viably deliver any affordable housing.

It is important to note that the preferred location for older persons housing is close to services within settlements and as such will come forward predominantly on brownfield sites. The NPPF establishes at paragraph 35 that viability is an issue to be considered at plan making with paragraph 58 clarifying the decision makers should be able to assume that development that complies with the policies are viable. This places greater importance on the plan taking into account the findings of viability at plan making and reflecting these in policy. Whilst the NPPF does not rule out negotiation on such issues as part of the decision making process it should not be a requirement where the Council's own evidence indicates that the policies in the plan make the development of older people's housing on brownfield sites unviable across the district.

When considering these issues, the HBF recognises that paragraph 10-007 of the PPG references older people's housing as being one type of development where there maybe circumstances supporting a further consideration of viability at the plan application stage. However, this paragraph also outlines that these circumstances will be relevant in relation to unallocated sites of a wholly different type to that used in the viability assessment. This

indicates that where development scenarios have not been considered this is one such circumstance where viability assessments at the application stage may be necessary and should be considered by the Council. It does not mean that they should give no consideration to their evidence at plan making. Specialist accommodation for older people has been considered by the council with the evidence showing that the policies in this plan will make such development unviable and as such the Council should act on that evidence and not defer it wholly to decision makers on an application by application basis. The HBF would therefore suggest that policy SP5 is amended to reflect the Council's evidence.

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