

NORTH WEST LEICESTERSHIRE LOCAL PLAN EXAMINATION

MATTER 4 - Affordable Housing and Viability
Inspector's Key Issues and Questions in bold text.

The following Hearing Statement is made for and on behalf of the Home Builders Federation (HBF) in regard to the North West Leicestershire Local Plan. This Statement responds to selected questions set out in the Inspectors Matters & Issues document. The following answers should be read in conjunction with our representations to the Local Plan pre submission consultation ended on 15th August 2016.

4a. Are the numerical thresholds for, and levels of, contribution set by Policy H4 for affordable housing from new development robustly supported by evidence of viability? [LP/09]

The HBF is concerned that if the proposed thresholds and levels of affordable housing provision set out in Policy H4 are applied to brownfield sites policy compliant development would be unviable as shown by the Council's own viability testing evidence. It is suggested that all brownfield sites should be excluded from Policy H4 to avoid the necessity for such sites to be routinely negotiated because they are not viable.

4b. Should provision be made in Policy H4 to accommodate Government low-cost housing initiatives?

Until further guidance and clarity is provided by Government on its proposals for low cost housing initiatives such as Starter Homes it is difficult to include such provision into Policy H4. These intentions may become clearer on publication of the Government's Housing White Paper (anticipated in January 2017). However until such time it is recommended that the Council should not try to future proof Policy H4 by attempting to second guess the Government's intentions.

4c. To what extent do the provisions of Policy H4, and the evidence supporting it, apply to currently undeveloped housing sites with planning permission or resolutions to approve nominated in Policies H1 and H2 and does this have any implications for their delivery?

Presumably undeveloped sites identified in Policies H1 and H2 would only be effected by Policy H4 in circumstances of renewing a lapsed permission, varying an existing permission and an application for reserved matters. However as the site thresholds and levels of provision in Policy H4 are the same as those set out in the currently adopted Affordable Housing SPD any implications for delivery are likely to be minimal.

4d. Is the Viability Assessment of the Plan as a whole based on appropriate input data and benchmark land values so as to demonstrate that development is likely to come forward supported by necessary infrastructure? [LP/09]

As stated in answer to Question 4a the HBF is concerned that based on the input data and benchmark land values used in the Council's viability assessment brownfield sites are not viable and therefore unlikely to be able to provide financial contributions to either affordable housing or infrastructure.

**Susan E Green MRTPI
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