

East Lindsey Core Strategy 2016 – 2031 Examination

Lincolnshire County Council Written Statement

Matter 10 - Affordable & low cost housing (Policies SP7; SP8; SP9)

Main issue: Has the objectively assessed need for affordable housing been correctly assessed? Will Policies SP7 and SP8 ensure the delivery of sufficient affordable housing having regard to the viability of development; and are they justified in respect of how financial contributions could be used? Are the policy criteria sound? Should there be an uplift to the housing requirement to help meet affordable housing needs?

SP7 Affordable & Low Cost Housing

4. Is the size threshold of 15 homes justified?

No, CD23 suggests a lower threshold. The assessment sets out clear reasons for this: in paragraph 8.4 explaining that a lower threshold allows more "capturing" of more sites and 8.7 (also 9.14) summarizing evidence elsewhere in the document that demonstrates smaller sites are the most viable. There is no reason why the minimum from the Ministerial Statement cannot be applied, which is contributions from and including 11 units or 1,000 square metres.

6. Are the contribution requirements for the Coast (0%), the rest of the District excluding Woodhall Spa (30%), and Woodhall Spa (40%) justified by the viability evidence? In particular, would the viability of larger sites subject to the 30% requirement be put at risk? Is the new build sales value used in the Economic Viability Assessment Update 2015 (CD23) realistic? Is it justified to calculate financial contributions in lieu of on-site provision on the basis of market sales values rather than land values?

The District Council in policy SP7 has followed the recommendations (from paragraph 9.8 of CD23) of the consultants who have prepared the viability assessment. Specifically on larger sites, the number of sites coming forward at 478 dwellings or above (typologies 7 and 8 in table G Appendix II to CD23) is likely to be limited in East Lindsey and it is at this level where CD23 information shows there could be a need to look at viability in more detail. For this size of sites, it would be very common for a site-based viability assessment to be carried out and this would allow the District Council to take a view on its policy position, in light of more detailed site-specific viability assumption and other factors such as the supply of housing land across the district. By virtue of clause 2, the District Council have established a process for this site-specific assessment to take place and for that to be considered. Most importantly, GVA have recommended that 30% is appropriate.

7. Are the precise zones to which the different contribution rates apply clearly set out in the plan? If not, should they be defined in order to ensure clarity and effectiveness?

The zones are not shown in the Plan but paragraph 7 of chapter 3 refers to the 'Economic Viability Assessment'. It could be potentially confusing for applicants and decision-makers in applying policy SP7 to refer to the zones at all. One potential way forward would be to remove the reference to the zones. The Plan could simply refer to Woodhall Spa and relevant neighbouring parishes (the boundaries of which will already be publicly available or could be easily included in the Plan) and the coastal zone (which is identified in the Plan in reference to flood risk issues). All other boundaries or zones are essentially irrelevant.

8. Should Clause 2 be reworded to clarify that Clause 1 will apply unless a detailed, site-specific assessment commissioned by the developer demonstrates that a reduced level of affordable housing is justified on grounds of viability? Is proposed amendment ADM19 required for soundness?

Yes, it is assumed that this was the intention of clause 2 and such an addition would simply set out those objectives more clearly.

9. Should Clause 4 specify the circumstances in which off-site provision would be acceptable?

No, there could be a multitude of reasons to accept an off-site contribution. This may include but would by no means be limited to viability, abnormal site conditions and management considerations for registered providers. It would be inappropriate to try to imagine what these reasons would be so that an open list could be included in the policy. In any case, it should be for applicants to justify why such circumstances apply since the District Council has been clear that on-site would be its objective. This is also common place in other Local Plans. One example is the recently adopted Central Lincolnshire Local Plan and its LP11.

11. Should the policy make reference to starter homes?

No, the national policy position on 'starter homes' is not currently clear. Should this change then national policy will become a material consideration in any application decisions. More specifically, 'starter homes' are proposed to become part of the definition of 'affordable housing' and this wider term will also include 'starter homes' so it is sufficient that SP7 refer to 'affordable housing'.