

Response to Inspector's Matters, Issues and Questions (MIQs)

On behalf of Persimmon Homes

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Matter 8: Affordable Housing, Housing Mix and Specialist Needs H1, H2, H3 and H5

- Question 1:** Persimmon considers that with the adoption of an appropriate Community Infrastructure Levy (CIL), which although not yet subject to an Examination (which may take place before the end of 2015), that the application of a £70 per sq.m for new residential floorspace, will render the delivery of 40% affordable housing on both sites S2 (f) West of Broad Street Green and RE 2 North of Scraley Road, undeliverable in viability terms (Policy H1). The CIL does not account for affordable housing and therefore on top of the CIL charge rate, there will be a requirement for the delivery of 40% affordable housing if the policy remains unchanged. There is the potential for a relaxation of this percentage provided for in Policy H1 but where it is clear from evidence from the outset that this affordable housing percentage cannot be achieved, the Policy should be amended to make the Plan sound. We would welcome sighting of the Council's further considerations on this point.
- Question 2:** The evidence base document EB040d CIL Development Viability (May 2014) still includes the proposal to charge £70psqm for residential on site S2(f), although this evidence base document now accepts that site S2 (e) should have a £0 per sqm CIL rate which may make the delivery of 40% affordable housing viable on this site. No such concession is proposed for site S2(f) but it is not clear why this is so.
- Question 4:** Providing the affordable housing percentages are amended as main modifications by the Inspector in considering whether the Plan is sound as referred to in answer to Questions 1 and 2 above, and the Council's approach providing the ability to consider site viability and deliverability remains in Policy H1, then this is a robust position for the Council to take in seeking to deliver levels of affordable housing for the district. Like general housing numbers the Council has an historic low delivery rate but the reality of viable development means that each site can only deliver what is viable in the context of other

infrastructure requirements and site circumstances. To set an unrealistically high level of affordable housing would make the Plan unsound.

Question 5: The Council's proposed modifications (Doc 103 paras 2.26 and 2.27) are not acceptable to Persimmon. The Council may have an unrealistic view of the 'reasonable price to be sold to a registered provider' and therefore the test should be more objectively set as at a price the market is willing to pay.

Affordable housing should be provided on site either through free serviced land provided to a registered provider or constructed affordable dwellings to be sold to a registered provider upon completion at a price that has been agreed as reasonable by the Council.

Question 6: We would welcome sighting of the Council's suggested modifications referred to in paras 2.26 and 2.27 of Doc 103 regarding a reduced affordable housing percentage before commenting further.