

Matter 8: Affordable Housing, Housing Mix and Specialist Needs

Issue 2: Whether policy H2 and its associated text dealing with housing mix is justified by the evidence, consistent with national policy, and effective.

Q8 and Q9 – Does the latest SHMA alter the policy’s housing mix? Does the policy need to be altered to make development sites viable?

Policy H2 does not set a specific housing mix, nor does it require a specific percentage of homes for the elderly.

The SHMA is referred to in the supporting text only. The SHMA is likely to be updated regularly during the lifetime of the Plan, and it is important therefore that the policy is not tied to a specific mix or a specific iteration of the SHMA.

It is our understanding that reference to the 2012 SHMA in the supporting text does not mean that the Policy requires all development to comply with the SHMA, only that the SHMA should be taken as a guide (which at this moment in time is identifying a need for an increase in 1 and 2 bed roomed accommodation).

If the Policy *were* to be interpreted as requiring that all new market housing should be 60% 1 and 2 bed units, as per the SHMA, then that would create a significant discrepancy between the Policy and the Council’s Viability Study, which makes no such assumption. For example, as we understand it, the dwelling mix for the purposes of the Viability Study for the North Heybridge Garden Suburb (NHGS) was that set out at EB040b (page 53) which was for 30% 2 bed units, and 70% 3, 4 and 5 bed units.

Clearly housing mix can have an impact on development viability, and we note that as presently drafted, neither Policy H2 nor its supporting text makes reference to the fact that viability is a factor in determining housing mix at the application stage, and it may assist future interpretation of this policy if that caveat were included.

Issue 3: Whether Policy H3 and its associated text dealing with accommodation for specialist needs is justified by the evidence, consistent with national policy, and effective

In our representations to Policies S3 and S4, we raised concerns regarding the references to a “significant proportion” of new homes being for the elderly, and noted that flexibility in housing mix would be needed if schemes were to be viable.

We would therefore be concerned if Policy H3 were altered to require a specific proportion of homes for the elderly, not only on the grounds of viability, but also on the grounds, as set out in our original representations, that (1) the elderly do not always require or demand specialist accommodation – many older people wish to live in their own homes in mixed-age communities, and therefore it is neither possible nor desirable to segregate or classify homes according to age.

In terms of C2 uses and their contribution to supply, it has traditionally been the case that C2 uses were not counted as part of ‘normal’ housing supply, but the PPS indicates otherwise. There is no overt requirement in Policies S3, S4 or H3 that meeting the needs of the elderly means that

developments should include C2 units, and as explained above, providing homes suitable for the elderly is not synonymous with C2 accommodation (as indeed the PPS itself confirms in para 3-37, when it refers to suitable and appropriately sited market housing meeting the needs of the elderly).

If there were a requirement for the NHGS to deliver a proportion of C2 accommodation in lieu of market housing, then again, this would create a discrepancy with the Viability Study, which does not make any assumption about part of the development being for C2 rather than C3 uses.