

## **EXAMINATION OF THE COLCHESTER BOROUGH LOCAL PLAN 2017-2033 – SECTION 2 EXAMINATION**

### **MAIN MATTER 17- POLICIES DM8 TO DM11 - AFFORDABLE HOUSING, DEVELOPMENT DENSITY, HOUSING DIVERSITY AND GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE**

**ON BEHALF OF HOPKINS HOMES**

**WORD COUNT: 409**



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**Question 1 - Are the policies relating to Affordable Housing, Development Density, Housing Diversity and Gypsies, Travellers and Travelling Showpeople justified by appropriate available evidence, having regard to national guidance, and local context, and CLP 1?**

- 1.1 Hopkins Homes previously raised concerns regarding policy DM8 and has prepared this Hearing Statement having regard to the matters raised at that time and the modifications now suggested by the Council.
- 1.2 Hopkins Homes notes that the concerns that it raised have not been addressed at the point of submission or in subsequent amendments. Its answer to this question is therefore no, the policy is not justified any appropriate available evidence.
- 1.3 The Sustainability Appraisal at 10.8 seems to still refer to testing 20% as the required proportion and does not appear to have been updated with an assessment of the implications of this increase. The NPPG at ID Reference: 56-020-20150327, which relates to NPPF Paragraph 34, advises that policy requirements should be clear so that they can be accurately accounted for. Therefore, the required proposed affordable housing provision should be clearly justified to avoid ambiguity.
- 1.4 Furthermore, NPPG at ID Reference: 56-020-20150327 also advises that policy requirements should be informed by evidence of affordable housing needs. For example, the 2017 Viability Study highlights that relatively small, flatted schemes in both value areas were not viable at 30% affordable housing. The Viability Study states that the researched flatted schemes were unviable due to market conditions rather than as a result of proposed policies. Nevertheless, this raises further concerns that the proposed affordable housing provision of 30% is not considered to be adequately evidenced. The absence of a thorough assessment of this remains objected to.
- 1.5 Concerning this matter, Hopkins Homes suggests that the policy is amended to refer to a 20% requirement. The retention of the requirement for 30% will put applicants to the unnecessary burden of submitted viability evidence to demonstrate something that the Council's own viability work identifies as an issue.