

**KNOWSLEY CORE STRATEGY EXAMINATION**

**MATTER 7: PARTICULAR HOUSING NEEDS**

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**ON BEHALF OF JUNCTION PROPERTY LTD (JPL)**

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**Affordable Housing.**

**1. Question 7.1: Rebalancing the Housing Market**

- 1.1 Knowsley has one of the highest proportions of social housing stock in England. According to the SHMA (1.9.3), 31.5% of the stock in 2001 was social housing compared to 24% in Merseyside, 20.1% in the North West Region, and 19.3% nationally. Equally there was a lower level of owner occupation. In Knowsley, some 60.5% of the stock was owner occupied compared to 65.4% in Merseyside, 68.7% in the North West Region, and 68.1% nationally. The position had not significantly altered by the time of the 2011 Census which showed that 28.5% of the total stock was social housing compared to 18.9% in the North West and 17.8% in England as a whole.
- 1.2 Given this background, JPL considers that the SCS requirement for 75% of affordable dwellings to be social housing would not assist the objective set out in Policy CS2 of rebalancing the housing market.

**2. Question 7.2: The Viability Assessment**

- 2.1 The starting point to consider this matter is paragraph 173 of the NPPF. This states that plans must be deliverable. Therefore, proposals should not be the subject to such a scale of obligations and policy burdens that their viability would be threatened. Paragraph 174 makes clear that in any assessment of viability, local planning authorities should take into account not only the impact of individual requirements such as affordable housing but also the "*likely cumulative impacts*" of all existing and proposed local standards when added to nationally required standards.
- 2.2 The Keppie Massie Study (Tables 7.30 – 7.32) (EB06) shows that at 25% affordable housing, many development sites within the urban area would be unviable, even without the addition of other local plan standards and requirements. When these standards and requirements are added (including Code Level 5 from 2016) the bulk of housing development in the Borough would not be viable with 25% affordable housing. Even many Green Belt sites would be unviable according to the Keppie Massie tables.

- 2.3 The only sensible conclusion is that the 25% requirement is not justified in the form that it is proposed in Policy CS15. JPL considers that the Boroughwide target should be reduced and/or the policy should distinguish between types of site and area.

3. **Question 7.3: Registered Providers**

- 3.1 There is no requirement in the NPPF that all new affordable housing should be made available "*in partnership with Registered Providers.*" The definition of affordable housing in Annex 2 of the Framework limits the requirement for the involvement of Registered Providers to affordable rented and social rented housing only. There is no similar requirement for intermediate housing. In consequence, JPL considers that part f) of Policy CS6 should be deleted.

4. **Question 7.4: Tenure Split**

- 4.1 The tenure split between affordable rent and intermediate housing derives from the SHMA (14.8.3). However, the evidence supporting it in the SHMA is tentative at best, if not absent. Moreover as the SHMA predates the Keppie Massie Study, the impacts of this split on viability could not have been taken into account in its recommendation.
- 4.2 JPL considers that a 50:50 split between affordable rented and intermediate housing would be more appropriate. It would improve the potential viability of housing schemes and thus achieve more affordable housing overall. It would also assist rebalancing the housing stock. Finally it would better accord with the aspirations of households. In this regard, the SHMA (14.7.4) says that 38% of "*concealed households forming*" express a need, and 59% a preference, for owner occupation.

5. **Questions 7.6–7.8: Gypsy and Traveller Provision.**

- 5.1 No comments.