

Barton Willmore, now Stantec on behalf of Story Homes

Examination into the Lancaster District Local Plan (Climate Emergency Review of the Strategic Policies and Land Allocations Development Plan Document and the Climate Emergency Review of the Development Management Development Plan Document)

Hearing Statement

Matter 8 – Viability and First Homes

Q8.4 Taking account of the Council’s viability work, would the requirements of the Plans’ policies put the viability of the implementation of the Plans at serious risk? Have all of the Plans’ policy requirements, including requirements of Policies CC1, T2, T4, SC4, SP8, DM29, DM30a, DM30b, DM30c, DM33, DM34, DM45, DM59, and DM62 been factored in?

1. As stated within responses on matters 3, 4, and 6, the viability evidence produced is not sufficiently robust to accurately show the level of impact that the proposed additional policy requirements of T4, SP8, DM30a, DM30c, and DM34. As such, the results give a misleading picture in terms of the viability implications of the proposed additional policy requirements, which are likely to be worse than stated.
2. Despite adopting its Local Plan in 2020, the Council can currently only demonstrate a 2.6 year housing land supply. A contributing factor to this lack of delivery has been issues surrounding the viability of allocated sites.
3. This would be exacerbated by the added costs associated with new policy requirements set out in the Climate Change Review.
4. It is therefore critical that there is a full understanding of these implications to ensure that the delivery of development to meet the established needs of the city is not unduly hampered.
5. Cushman & Wakefield undertook detailed analysis of the Council’s viability evidence as part of their Regulation 19 consultation representations on behalf of the Cumbria Housebuilder Association, of which Story Homes is a part of. This identified a number of matters where information was lacking. It is understood that Cushman & Wakefield will be providing a Hearing Statement on Matter 8 which will also comment on these deficiencies.

Q8.6 Is there scope for any requirements to be relaxed in instances where development would not be viable? Is the appropriate mechanism for this within Policy DM58 or should it be included in other policies throughout the Plans?

6. Based on the current wording of the policies sufficient scope does not exist. It would be beneficial for DM58 to be amended to include a priority list of the requirements that may be relaxed if viability issues are present. It should also be made clear that DM58 can be applied to all new policy requirements with viability implications.
7. In this way the most important deliverables are prioritised and have a greater chance of delivery.

Q8.8 Should there be any transitional arrangements for the introduction of additional policy requirements for viability reasons?

8. There should be transitional arrangements in place in terms of the requirements of Policy 30a – Sustainable Design and Construction. Full details of the reasoning behind this are set out in evidence produced by Cushman and Wakefield on behalf of the Cumbrian Housebuilders Federation and submitted to the consultation of the Regulation 19 draft.
9. It is understood that Cushman and Wakefield will also be producing a Hearing Statement on this point to inform the examination.

Q8.9 Is Policy DM3 justified or consistent with national policy and the PPG's advice?

10. The PPG is clear that local plan policies should reflect a requirement for first homes. This requirement is stated as a minimum of 25% of the affordable homes provided.
11. As the Local Plan is undertaking a review, it will be required to take account of the first homes requirement in accordance with Paragraph: 018 Reference ID: 70-018-20210524 of the PPG.

Q8.10 Are Policy DM3 and the supporting text consistent in how First Homes are dealt with?

12. Paragraph 4.31 of the justification text clearly details the requirement for first homes. However, this is not reflected within the wording of Policy DM3 itself. As the Plan is being reviewed, the wording of the policy should be amended to reflect the requirements for first homes.