

Reference ID 1118740

Larkfleet Homes

Huntingdonshire Local Plan Examination

Matter 13: Strengthening
Communities

Issue 13: Strengthening Communities

Affordable housing – Policy LP25

- 1) What is the evidence in relation to the need for affordable housing? What does this show?**
- 2) What are the trends in delivery of affordable housing and how has it been delivered? How is this likely to change in future?**
- 3) What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes? What does it show?**
- 4) Is the target of 40% realistic and justified?**
- 5) Is the threshold for the number of homes/floorspace justified?**
- 6) Is the approach to the mix of tenures justified?**
- 7) Is the policy sufficiently flexible, particularly in terms of the effect on viability and the potential for off-site contributions?**
- 8) Are the policy requirements justified and is the policy effective and consistent with national policy?**

1. RPS set out on behalf of Larkfleet Homes in representations to the Proposed Submission Local Plan how the policy approach relating to affordable housing was flawed and that the policy as worded was not considered to be justified, effective or consistent with national policy. RPS response to Matter 13 responds to all the questions other than Q5 relating to the threshold.
2. In response to Q1 relating to the need for affordable housing and Q2 about trends, RPS makes the following points. As set out in the Huntingdonshire Objectively Assessed Housing Need report (April 2017) produced by Cambridgeshire County Council Research Group (HOUS/01), *“the total need for affordable housing (for Huntingdonshire) that has been calculated is 7,897 houses for 2011-2036”* (para. 6 and also referenced at paragraph 132). It also sets out at paragraph 128 that the unmet (gross) need for affordable housing was 3,168 households.
3. There is clearly worsening affordability due to a growing gap between average earnings and housing costs. As indicated in paragraph 100 of the OAN report, (HOUS/01), the ratio of lower quartile house price to lower quartile earnings ratio suggests *“that there is a worsening trend in Huntingdonshire since 2014 and housing is relatively less affordable than in East Northants”*. The issue about worsening affordability is also referenced in paragraph 1.10 of the Council’s Annual Monitoring Report, December 2017 (HOUS/02).
4. It is also apparent that the percentage of affordable housing provided on sites has been markedly below the 40% target. Indeed, the percentage of affordable dwelling completions from 2002/03 to 2016 has not once reached this target. Paragraph 133 of the OAN report (HOUS/01) which references Figure 20, shows that the percentage of affordable dwelling completions ranged from 6% of all completions in 2012/13 to a maximum of 37% of all completions in 2009/10 and that the average over the period 2002 to 2016 was 21% (RPS emphasis). Paragraph 1.10 of the AMR (HOUS/02) sets out that in 2016/17, only 128 new affordable homes were completed, amounting to 16.2% of all new dwellings completed, and 32.6% of completions on qualifying sites.
5. With regard to the percentage of affordable housing required in the future, the OAN report (HOUS/01) sets out at paragraph 134 that the overall housing figure has been identified as 20,100 and that therefore if the total housing need is 7,897 then the required number of

affordable homes is 39% of the overall housing figure. This is considerably above the average percentage of 21% of affordable dwelling completions from 2002-2016. DLP, on behalf of Larkfleet Homes, considers in its response to Matter 4, what an appropriate housing figure should be. However, it is noticeable that paragraph 145 of the OAN report states that HDC should consider an increase in the total housing figures included in the local *plan* “if it could help deliver the required number of affordable homes”. However, this is not something that HDC have addressed

6. In response to Q3 about viability evidence relating to the delivery of affordable housing and Q4 about the 40% target, RPS has considered what the level of affordable housing that has, or will be provided on a number of strategic sites. The 40% affordable housing target has been informed by the OAN report and also a number of viability studies undertaken by Cushman & Wakefield. Paragraph 5.3.1 Key issues for Huntingdonshire District Council of the Cushman & Wakefield Local Plan Viability Study (June 2017) (INF/04) states on page 29 that *“it is recommended that a policy relating to the requirement of up to 40% affordable housing across all residential developments is included in the HLP2036 subject to viability”*.
7. The Local Plan Viability Study Addendum (December 2017) (INF/05) states at paragraph 5.2 and on page 19 that: *“...our recommendation is that a policy relating to a requirement of up to 40% affordable housing across all residential developments is included in the HLP2036 subject to viability”*.
8. The viability studies, whilst indicating that a 40% target for onsite delivery is broadly viable recognises that some typologies and development in lower value areas are less viable and that therefore the study suggests that a target in the region 35-40% would be more appropriate.
9. With regard to the level of affordable housing that is being provided through the Strategic Expansion Locations, it is noted that at St Neots East (Ref. 13/00178/OUT . refused and subsequent appeal withdrawn) this proposed an affordable housing target of 10% at application stage but this was lowered to approximately 3% affordable housing for the appeal based on an updated viability appraisal. Deloitte in their sensitivity analysis summary (21 April 2016)¹, which was produced on behalf of the Council (in relation to application 13/00178) indicated that Wintringham Park can support 31% affordable housing, based on five changes.
10. Whilst a new application has been submitted (under reference 17/02308/OUT)², for Wintringham Park (St Neots East), paragraph 7.142 of the Development Management Committee Report (19 March 2018) states that *“the application proposes that affordable housing will be delivered at a rate of 25% of the first 500 dwellings”*. Whilst the report references that there will be a review mechanism to determine the percentage of subsequent phases, the details of the review mechanism are yet to be determined”. The minutes of the Committee Report ³ references that the application will either be approved, subject to completion of the s106, or refused if the applicant is unwilling to complete the obligation

¹ <http://docs.huntingdonshire.gov.uk/AnitePublicDocs/01354011.pdf>

² <https://applications.huntingdonshire.gov.uk/moderngov/documents/s91923/1702308OUT.pdf>

³

<https://applications.huntingdonshire.gov.uk/moderngov/documents/s92179/Minutes%20of%20Previous%20Meeting.pdf>

necessary to make it acceptable in planning terms. As at 5 July 2018, the application had not yet been determined. Even if the application is approved with 25% affordable dwellings, this is below the 31% that Deloitte had previously referenced in their sensitivity analysis summary for Wintringham Park, and also well below the 40% target that the Plan is seeking to impose. Furthermore, as the application is for up to 2,800 dwellings, there is also considerable uncertainty as to how much affordable housing provision will potentially be provided on the remaining 2,300 dwellings to be built as part of later phases.

11. RPS also notes that that for the development at Alconbury Airfield and Grange Farm (Ref. 12/01158/OUT) an affordable housing target of 10% has been approved for Phase 1, with future phases to be subject to a review process as specified in the S106 Agreement.
12. As set out in RPS response to Matters 3, 6, 7 and 12, we consider that in some instances delivery of sites may not occur and even where this does occur that delivery rates will be considerable lower than envisaged by the Council. Whilst it is acknowledged that these applications relate to early phases, there is considerable uncertainty as to whether the level of affordable housing will increase in later phases. Furthermore, as delivery will be slower than envisaged then this will have a corresponding impact on the ability of the sites to provide an element of affordable housing, in order to meet the pressing need, including unmet need.
13. As also referenced in RPS hearing statement to Matter 3, alternative development sites should therefore be considered in order to address housing need, including the need for affordable housing. The Delivery Document for Sibson Garden Village, which supported the Expression of Interest stated that %Sibson Garden Village will have a dramatic influence on the provision of affordable homes in Huntingdonshire by providing 40% of dwellings as affordable housing+(page 19).
14. There is a demonstrable need for affordable housing and there has clearly been an undersupply of affordable housing in every year since 2002. The policy wording as proposed provides support for proposals where they can deliver a target of 40% affordable housing, yet this target has not been reached once since 2002.
15. Page 29 of RPS representation to the Proposed Submission Local Plan covers this issue in more detail and includes a table (Figure 3 . Affordable Housing completions in Huntingdonshire 2011-2016) that demonstrates between 2011/12 and 2015/16 only 10.5% of the housing completions have been for Affordable Housing (304 of 2996 houses). As set out above, and in RPS representation to Matters 6 and 7 the allocated SELs at Alconbury Weald and St Neots have thus far been unable to deliver the proposed Affordable Housing Target.
16. As set out in the RPS hearing statement to Matter 3 The Delivery Document for Sibson Garden Village, which supported the Expression of Interest stated that %Sibson Garden Village will have a dramatic influence on the provision of affordable homes in Huntingdonshire by providing 40% of dwellings as affordable housing+(page 19). Preferential consideration should be given to those sites that are capable of providing 40% housing.
17. With regard to Q6 and tenure mix, RPS do not consider it necessary to specify in criterion b) about providing approximately 70% of the new affordable housing units as social or affordable rented properties. In line with the NPPF, the policy should provide flexibility to align to changing market conditions or changes in government policy. Instead, the policy should reference that the mix of tenure provision will have regard to the most up-to-date evidence of need.

18. With regard to Q7 and whether the policy is sufficiently flexible, the policy is pushing the limits of viability of development as referenced in our response to this Matter. It is therefore important that the policy is as flexible as possible rather than being unduly prescriptive in terms of both the setting and appearance of affordable housing units as referenced in criteria c) and d) of the policy. This will enable developers to have the best opportunity in terms of actually delivering affordable housing.
19. With regard to question 8, Paragraph 47 of the NPPF is clear that to help boost significantly the supply of housing, Local Plans should meet the full objectively assessed needs for market and affordable housing. From the evidence, it is not clear that the full need for affordable housing will be met, and therefore the policy is not considered to be effective as currently drafted.

Housing Mix – Policy LP26

8) What is the evidence in relation to the requirements for accessible and adaptable homes in terms of need and viability? Is the approach justified?

9) Are the overall policy requirements justified and is the policy effective and consistent with national policy?

20. The Council's evidence is set out in the Accessible and Specialist Housing Need Evidence Paper (HOUS/04), which provides an overview of national evidence with regard to accessibility in Part 6. The Government decided not to make part M4(2) or M4(3) of the Building Regulations mandatory for planning but instead authorities can choose to opt into these standards via Local Plan policy. The NPPF requires that plans should be deliverable and relevant to local economic and market conditions, and therefore authorities need to gather and demonstrate evidence of need, taking into account viability testing. Evidence will therefore be needed to demonstrate that the need for adaptable and accessible homes within Huntingdonshire is substantially different to those found nationally. Paragraph 6.23 of HOUS/04 recognises that "*Huntingdonshire, in common with the UK as a whole, has a significant and increasing older population*". Therefore, this suggests that Huntingdonshire is not different to the rest of the UK.
21. Whilst the Council reference in paragraph 6.25 of HOUS/04 that the number of people with a disability will increase as the population increases, there is no comparative analysis against other areas of the country to demonstrate that this is different than elsewhere. Furthermore, paragraph 6.26 of HOUS/04 states that the group of people with disabilities in Huntingdonshire will actually fall slightly in the future as a proportion of the total population.
22. In light of the fact that the government did not make M4(2) or M4(3) mandatory, it is considered that the evidence produced by the Council has not substantiated that the need for such dwellings is different than other areas of the Country,
23. The Council has produced its own formula for working out what the net need is for homes to be built to the higher accessibility standards by considering the gross need for accessible housing, minus the supply of accessible homes, and dividing this by the current need. However, the Council's approach is not considered to be robust as clearly not all of people over 65 will be in need of an accessible home. The Council's formula also does not take into account that some older or disabled people live in care at present, or how the expected increase in the number of care home beds will accommodate the needs of those who have

limited mobility. Furthermore, as 90% of older British people live in general housing as referenced in paragraph 6.15 of HOUS/04, this suggests that many older people may want to remain in their own homes. The Disabled Facilities Grant, which is available, will help those who need more accessible accommodation to stay within their existing home, but this has not been factored into the Council's formula.

24. It is acknowledged that some homes will need to be built to a higher accessible standard but the Council's evidence does not provide sufficient justification to require all new homes to be built to Part M4(2).
25. With regard to Part M4(3), the Council's approach requires the provision of some market homes at this higher standard. However, the PPG requires the end user to be known. PPG states in paragraph 56-009 that:
“Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.”
26. Therefore, it is considered that criterion g) of the policy is not consistent with the NPPG and should therefore be deleted.