

Session 6

Respondent number: 1045 / 1325

Affordable Housing

STATEMENT OF CASE

BARTON WILLMORE
ON BEHALF OF

SUTHERLAND HOMES
AND COLTISHALL GROUP

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SUMMARY OF OBJECTION

This statement summarises the objections in relation to affordable housing as follows:

(i) SS3 Housing:

No provision for affordable housing is included in SS3. Affordable housing is a major part of the Council's housing strategy and should be included in SS3.

(ii) Policy HO2

The affordable housing quota's in Policy HO2 should be lower and made more flexible to accord with Regional Policies in the East of England RSS. Housing need as defined in the SHMA practice note is different from meeting the need for affordable housing, as was the case under the Housing Needs Assessment studies. Affordable housing should cater for the range of sub-market housing needs and not predominately social rented needs.

1.0 FURTHER EXPLANATION POLICY SS3 OMISSION

1.1 Policy SS3 should include provision for affordable housing as follows:

“The Council will require a mix of dwelling types, size and accommodation, to accommodate a balance of different household types and lifestyle choices to contribute to the creation of mixed and inclusive communities. The mix will be dependent on grant provisions and implemented through a cascade approach.

In new residential development the Council will expect a proportion, not exceeding 35% of houses to be affordable on threshold sites and will allocate rural exception sites adjacent to defined rural settlements and urban exception sites adjacent to urban settlements for 100% local needs.”

1.2 There are several justifications for this approach as follows:

- (a) Affordable Housing is a major strand of housing policy and needs to be incorporated into SS3 or given a separate policy status.
- (b) The policy approach to meet the substantial shortfall in affordable housing in the District (SHMA states need for 921 units/ha) is to increase quota's and reduce thresholds. Studies in Elmbridge B.C and Spelthorne B.C in Surrey have demonstrated that threshold reduction has not led to an increase in supply, applicants still seek to get below site size thresholds or provide mixed use schemes to achieve the same. Increasing quota's above the 35% recommended in the RSS Panel Report needs to be justified by a strong evidence base including studies into the viability impact of such thresholds. The preferred approach is to keep quota's at 35% and identify exception sites for 100% affordable housing adjoining rural and town settlements.

2.0 FURTHER EXPLANATION POLICY HO2 CHANGES

2.1 The SHMA (2007) defines housing need as 921 units per annum. It is accepted this is significant in the regional context.

2.2 The Annual Monitoring Report 2006 states that in 2004 the supply of affordable housing was set to build 375 dwellings by 2009 (75 per annum). In light of the high levels needed this was increased to 90 dwellings per year from 2006-2009.

Affordable Housing Completions	01/02	02/03	03/04	04/05	05/06	Total	Average
	73	23	16	126	81	319	63.8

2.3 In 2005/06 81 affordable units were built and in 04/05 this figure was 126. However, in the previous three years from 01/02 until 03/04 only 114 affordable units were built. The average for the five year period is 63.8 dwellings per year and is therefore 56 dwellings below the 375 (5x75) target.

2.4 Policy HO2 applies lower thresholds of 10 units/0.33 Ha (0.8 acres) for towns and 2 units/0.1 Ha (0.2 acres) in other settlements. Apart from demonstrating the number of historic sites that would be captured by lowering thresholds there is no evidence of market testing to show that reducing thresholds will lead to an increased supply of affordable housing. In our view thresholds should be:

- 15 units/0.5 Ha for Towns and larger settlements
- 5 units/0.16 Ha for other rural settlements

2.5 The quota of 45% proposed in Policy HO2 should be reduced to 35% to accord with the RSS Panel Report. There is no evidence of market testing or viability impact assessment to justify the higher level.

2.6 The SHMA Practice Guidance Note Version 2 August 2007 defines affordable housing as “the number of households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market.” In this sense the definition relates to the whole range of housing needs that cannot be met in the market, including shared equity, intermediate and social rents.

2.7 Dr. Fordham was involved in a Secretary of State's recovered appeal in Runnymede Borough Council APP/Q3630/A/05/1198326 which was allowed for 100% affordable housing on a safeguarded housing site. The Inspector (para 7.13) noted that Dr. Fordham had adopted an

unnecessarily restrictive definition of housing need which arises from “Local Housing Needs Assessment: A Guide to Good Practice”. The Inspector stated “However, while I recognised that this approach will have value in identifying groups most in need of assistance in realising their housing aspirations, I regard the approach as retaining relatively narrow and unduly restrictive approach to the concept of what comes within the ambit of the term Affordable Housing”.

- 2.8 Such a narrow approach to the definition of affordable housing has been applied to Policy HO2 where 80% social rented housing is required with PPS3 housing sites. This reference should be deleted and reference be made to the mix of tenure being dependent on the availability of grant and applied through the cascade process.