

## **WEST NORTHAMPTONSHIRE**

### **JOINT STRATEGIC PLANNING COMMITTEE**

West Northamptonshire Affordable Housing SPD
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#### **REPORT OF THE INTERIM HEAD- JOINT PLANNING UNIT**

##### **Purpose**

- 1.1 The purpose of this report is to summarise the consultation process and outline the responses to the West Northamptonshire Affordable Housing Supplementary Planning Document and accompanying Sustainability Appraisal appended to the Affordable Housing Supplementary Planning Document.
- 1.2 The purpose of the Affordable Housing Supplementary Planning Document, once adopted, is to provide interim supplementary policy guidance based on the saved local plan policies of the three districts of West Northamptonshire until the adoption of the Developer Contributions and Affordable Housing Development Plan Document and Joint Core Strategy. These are programmed for adoption in the Local Development Scheme for September 2011 and January 2011 respectively.

##### **Recommendation**

- 2.1 That the Joint Strategic Planning Committee notes the responses received and support the proposed 'Next Steps' in Section 4.

##### **Summary of Consultation Process:**

- 3.1 Consultation commenced on 9th April and lasted for 6 weeks. A press notice was placed in the local papers prior to the consultation period explaining the purpose of the Affordable Housing Supplementary Planning Document and how comments can be submitted to the Joint Planning Unit.
- 3.2 The document was placed on the Joint Planning Unit and councils' websites. Copies were made available at the councils' offices and at local libraries.

- 3.3 A total of approximately 2,000 emails and letters were sent to interested parties and stakeholders explaining the purpose of the Affordable Housing Supplementary Planning Document and how comments could be submitted.

### **Summary of Responses:**

- 4.1 There were 63 representations to the West Northamptonshire Affordable Housing Supplementary Planning Document consultation from numerous individuals and a wide range of organisations and agencies from the public, private and voluntary sectors.
- 4.2 15% of those consulted either had no comments or did not respond. (10 out of 66)
- 4.3 There was a clear concern voiced in numerous responses in respect of viability assessments. The concern over their use was mainly that there is not presently enough evidence to justify this policy and that viability data may be drawn from the economic period before the recession when the market was buoyant.
- 4.4 Many responses presented the view that a threshold of four homes in rural areas will not always be viable and should be subject to viability assessments.
- 4.5 7.1% (4 out of 56) stated that the housing market figures used to form a basis for the SPD were based on pre-recession data that they do not reflect current market conditions.
- 4.6 There was a strong response for keeping affordable housing to a minimum in rural settlements with 7.1% of the responses stating that the existing local populations should have priority for affordable housing.
- 4.7 A key issue raised by a number of respondents was the issue of flexibility in relation to affordable housing requirements. Many communicated the view that a standard policy for percentage of affordable housing requirements can discourage small site developments coming forward and may reduce the potential overall number of affordable housing delivered.
- 4.8 Of those who responded, 14% (8 out of 56) stated that having a requirement to limit groupings of affordable homes to 6 is too small, as specialist schemes such as assisted living for the elderly require many more units. A number of respondents voiced concern over maintenance issues stating that larger groupings were more desirable for Housing Associations.
- 4.9 4.7% of those who responded were in favour of tenure blind design. 5.3% of those who responded stated that tenure blind design standards will increase development costs and will make the proposed affordable housing percentages unviable, especially for rural South Northamptonshire in the current housing market.
- 4.10 General concerns were raised on the tenure mix policy and that service and maintenance charges should be consistent across tenures in the same

development. The specific point was also raised that specialist schemes like assisted living for the elderly can create tension and conflict between the different tenure groups and that site specific policy/ agreements are required.

- 4.11 Pepper potting was generally favoured although the issue of maintenance of these units was raised as a general concern.

#### **Next Steps:**

- 5.1 This report is a summary of the process and responses received in relation to the Affordable Housing Supplementary Planning Document to date. Officers are considering individual responses to the Affordable Housing Supplementary Planning Document consultation and writing a report that explains the acceptance or rejection of these responses. It is proposed that this report will be submitted to the 25th August Programme Board Meeting in the first instance.
- 5.2 An update of the West Northamptonshire Strategic Housing Market Assessment is currently being undertaken by independent consultants and is due for completion on 31st August. This technical evidence will inform affordable housing policy both in the Supplementary Planning Document and Developer Contributions and Affordable Housing Development Plan Document. As this update of the Strategic Housing Market Assessment will provide updated evidence there is a need to reconsider the timetable for the Affordable Housing Supplementary Planning Document to allow for time for the update of the Strategic Housing Market Assessment to be duly considered and inform a redraft of the Affordable Housing Supplementary Planning Document for consultation – expected in September 2009. The consultation period, in compliance with Regulations, would need to be between four and six weeks.
- 5.3 It would be possible to take forward the work without the evidence update but this course of action is not considered to be prudent given the need for policy to be supported by up to date evidence.

#### **Implications:**

- 6.1 Due to the current timetable for the Update of the Strategic Housing Market Assessment and the value of considering this updated evidence to inform the draft Affordable Housing Supplementary Planning Document will miss meeting the adopted Local Development Scheme timetable for plan adoption of September 2009. However, since Supplementary Planning Documents no longer need to be included in Local Development Schemes Government Office advice is that there are no penalties for this delay.
- 6.2 Whilst this further delays adoption of the Supplementary Planning Document (albeit supplementary and based on aging existing policy) it is considered that the value of an approach based on current evidence is not comparable to one that is based on up to date evidence.