

## Issue 4 Sub Matter: Affordable Housing

Friday 25 January 2012

### Issue 4: Is adequate provision made for specific housing needs?

#### Sub matter: Affordable Housing

*11.2 BNES/2 paragraph 5.7 indicates that the figure of 3,400 affordable dwellings to be delivered in the plan period in policy DW1 and in the monitoring framework is incorrect and should be 3,000, which accords with the Council's current assessment of likely delivery.*

- *In the context of the present plan, the figure of 3,400 is unjustified and the Council should put forward a proposed change prior to the hearings.*
- *How/where has the Council assessed the implications of this reduction in provision in relation to the overall strategy for housing provision?*

1. We consider that the implications of providing just 3,000 affordable dwellings need to be considered as part of the wider housing target and our comments on this can be found in our statement on that issue. A reduction from 3,400 affordable dwellings to 3,000 is unfortunate and will have a further detrimental impact on housing waiting lists in the district. However, we considered the target of 3,400 affordable dwellings to be well below what the Core Strategy should be aiming for. As we have suggested in our Response Paper on Issue 1, the minimum target should be 5,000 dwellings, failure to plan for this number or more will have very significant detrimental consequences on housing affordability and the housing waiting list.

*11.3 Is policy CP9 justified in seeking an average of 35% affordable housing on developments of 10 dwellings and more? Given the range of market values across the district is a single % figure the most appropriate approach?*

2. We restate our concerns in our representations (para 6.6 – 6.8) that a geographical split would be preferable to *the* suggestion that 45% affordable housing requirement may be required in areas with higher sales value. We are yet to see the Council's justification for rejecting this approach and would hope that it is included in their response to the Inspector's question.

*11.5 Does the most recent viability assessment relating to affordable rents (CD4/H15 June 2011) weaken the justification for the %s in the policy?*

3. We refer the Inspector to comments Tetlow King Planning made on behalf of the South West HARP Planning Consortium (enclosed), of which Somerset is a member (in relation to FPC29). This stated our concerns that the updated viability assessment which took in to account affordable rent showed achieving the 35% affordable housing target was less likely. This underlines the need for a flexible target which is the starting point for negotiation and allows each site to be considered on its merits.

*11.7 In my Further Preliminary Questions (ID/4) I indicated that the policy needed to address the issue of viability more fully. I remain of the view that policy CP9 is unsound in this regard as submitted. I suggested a possible remedy to the Council which is reflected in PC91. Does this proposed change make the policy sound in relation to viability considerations?*

4. We consider that the Council should set out more fully how it will 'use alternative mechanisms' to secure the highest possible provision for affordable housing. We recommend that the text box below the policy requirement should be amended to read:

*In exceptional circumstances, where the applicant has demonstrated a scheme is not viable **with the policy requirement for affordable housing** and this has been independently validated, the Council may consider the use of alternative mechanisms to achieve the full affordable housing requirement. **This could include requiring a different tenure mix of affordable housing or reducing the level of other planning contributions before they consider reducing the overall requirement for affordable housing.***

*11.8 As affordable rent is a new type of provision not included in existing assessments of affordable rent and provision how will the requirement in PC91 to demonstrate the need for affordable rent be achieved? Would this impose an unreasonable burden on applicants? What change is needed to make the plan sound in relation to the introduction of affordable rent?*

5. We restate the comments Tetlow King Planning made on behalf of the South West HARP Planning Consortium (Our ref M6/0518-05), of which Somerset is a member (in relation to PC95). This sets out our proposed amendments with regard to affordable rent to make the policy sound.

*11.9 I also previously questioned whether the requirement at the end of CP9 for all affordable units to remain at an affordable price for future eligible households is realistic, bearing in mind*

*that for some types of housing staircasing to full ownership may be allowed. PC91 includes the deletion of the word units, but I do not see what difference this makes. To reflect reality, and avoid an unintended impediment to delivery, should the policy refer to: arrangements being in place to recycle the subsidy for the provision of future affordable housing?*

6. We agree with the Inspector on this matter, we propose similar amendment to that used in the Bristol City Council Core Strategy Policy on Affordable Housing. This would mean the policy would be reworded as such:

*All affordable housing units delivered through this policy should remain at an affordable price for future eligible households or, **if this restriction is lifted, for the subsidy to be recycled for alternative affordable housing provision.***

#### **Sub Matter: Older Person Care and Accommodation**

7. In our representation to the Publication Version of the Core Strategy (December 2010) we set out the clear need for a specific policy on older person care and accommodation. This can be found in paragraphs 7.1 – 7.11 and a proposed policy was put forward. This was based on the overwhelming household growth from those aged 65 and above over the plan period. We will not repeat these arguments here, but we consider that a strategic policy is necessary for the Core Strategy to be considered sound.
8. The Sustainability Appraisal (CD4/A10) states on page 44 that Policy CP9 is not clear on how the housing needs of older people, disabled people and those with other special needs will be delivered, further emphasising the need for this issue to be properly considered at the examination.
9. Since then the draft NPPF has been released emphasising the need for policies which address the ageing population. In his written introduction, Minister for Cities and Decentralisation Greg Clark MP states that:  
  
*'We must house a rising population, which is living longer and wants to make new choices.'*
10. Paragraph 111 states that local authorities need to *'deliver a wide choice of quality homes'* and that they should:

*'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as families with children, the elderly and people with disabilities)'.*

11. In other words, local authorities will need to assess the demographic changes in their local area over the plan period and ensure that they are planning to meet the changing needs of different groups, including those who may have specialist accommodation and/or care needs.
12. The draft NPPF also states that Local Plans must meet objectively assessed need. In this case the DCLG household projections show a clear need for older person accommodation, brought about by the large household growth from this age group.
13. There are numerous other references in the document to assess the 'development needs' of various age groups and demographics.
14. We are also disappointed that given the amount of additional older person care and accommodation that will be required in the district the SHLAA, which will also be the basis for other development plan documents, does not properly consider potential which sites could be used for older person care and accommodation.
15. The recently published Housing Strategy also contains its own sub-section on meeting the needs of older people.