

HUNTINGDONSHIRE LOCAL PLAN EXAMINATION

Matter 13 – Strengthening communities

Affordable housing – Policy LP25

The evidence in relation to affordable housing indicates that whilst a 40% target for onsite delivery is broadly viable there will be situations where this level of affordable housing will be marginal. The conclusions to the viability study (page 27, section 5.3) set out these concerns outlining that some typologies and development in lower value areas are less viable. In such situations the viability study suggests that such development can sustain in the region of 35-40% but that for smaller developments in intermediate value areas the viability at this level of affordable housing provision is more negative.

Because the housing policy seeks to deliver at the upper end of what is being recommended in the viability study it is important that the policy offers as much flexibility as possible in relation to the Council's affordable housing policy, and indeed any policy that places additional burden on the development industry. In our representations we therefore welcomed the flexibility offered in the policy in terms of viability. However, given the viability evidence suggests that 40% will push the limits of viability of development in Huntingdonshire we would suggest that the policy is overly restrictive in terms of its approach to both the setting and appearance of affordable housing units across a site as set out in parts c and d of the policy. Allowing the developer to deliver the affordable housing provision in the manner that best suits the site and the scale of development being proposed will ensure that they can maximise viability and provide the best opportunity of delivering affordable housing. Given the evidence in the viability study we would suggest that the most important objective should be the delivery of affordable housing rather than its appearance and location.

Housing Mix – Policy LP26

The Council has set out its evidence to support its policy on accessible homes and adaptable homes in section 6 of the Accessible and Specialist Housing Need Evidence Paper (HOUS/04). To begin with the Council sets out the national evidence with regard to accessibility. Whilst this provides an interesting background it is also worth noting that on the basis of this evidence the Government decided not to make Part M4(2) or M4(3) mandatory standards. As such to require the application of this standard to all new homes will require evidence to show that the need for such homes within Huntingdonshire is substantially different to those found nationally. The Council's local evidence is presented in part of section 6 of HOUS/04 and states in paragraph 6.23:

“Huntingdonshire, in common with the rest of the UK has a significant and increasing older population.” (our emphasis).

So from the start the Council acknowledges that the evidence for Huntingdonshire in relation to older people is reflective of the national position. This suggests that whilst there is an ageing population the level of need is not significantly different to the national position. Similarly the Council has shown that the number of people with a disability will increase as the population grows the evidence provided does not indicate that this position is significantly different to those faced by authorities across the Country. In fact the Council recognises in paragraph 6.26 that in terms of the total number of working age adults with a disability the proportion in relation to total population is set to fall. The picture presented by the evidence is not one that is any different to that seen across the Country and to suggest that all new homes to be built to M4(2) is unjustified given that the Government does not think that such action, based on the same situation, is necessary.

Further to the evidence on need the Council seeks to apply a formula of its own design to try and decide how many homes should be built to the higher accessibility standards. This takes the gross need for accessible housing less the current supply of accessible homes and divides this by the current housing need. However, in trying to take such a complex issue and distil it into a formula has led to an approach that is fundamentally flawed. For example the formula does not consider:

- That the majority of any increase in the population of older people within the Borough will already live there, and that they are more likely to stay within their own homes. The 2011 Census showed that of 9,850 people living in Huntingdonshire had different address in Huntingdonshire in the year prior to the census. Of those people just 484 were over 65.
- It is not the case that all people over 65 will be in need of an accessible home, and will never need such a home. The Council’s own evidence base suggests that there are likely to be 11,100 people over 65 with some limitations to their activity. This is 20% of the total population over 65 in 2035 and 5.5% of the total population.
- The formula does not take into account the number of older or disabled people living in care at present, or the expected increase in care home beds expected during the plan period that will meet the accommodation needs of many of those with limited mobility.
- Estimated supply does not take into account the number of properties that will need to be adapted through the Disabled Facilities Grants during the plan period and which will allow those in need of more accessible accommodation to stay within their existing home.

Whilst we accept that there will be a need for some homes to be built to higher accessible standards we would suggest that the Council’s evidence does not provide sufficient justification to require all new homes to be built to Part M4(2).

With regard to Part M4(3) the Council’s approach requires the provision of some market homes at this higher standard. However, 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.”

Therefore part g of policy LP26 is not consistent with national policy and should be deleted.

Mark Behrendt MRTPI
Local Plans Manager – SE and E