

## **DRAFT AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT**

### Introduction

The East Devon Local Plan 2013 to 2031 (adopted January 2016) promotes the delivery of new affordable housing in the district. East Devon District Council is consulting on a draft Affordable Housing Supplementary Planning Document (SPD) to provide guidance on the implementation of affordable housing policies in the Local Plan, and the Cranbrook Plan when adopted.

The purpose of the Affordable Housing Supplementary Planning Document is to assist applicants when making planning applications, and the District Council in determining those.

### Cranbrook Town Council's Response

The draft SPD recognises that Cranbrook has provided “a significant supply of affordable housing delivery in East Devon over recent years” (page 15) and yet the map of East Devon on page 48 of the document has not been updated to include the parish of Cranbrook. This needs amending before the document is finalised.

The Town Council agrees with:

- a) the principle that affordable housing will be sought from all major residential developments, i.e. where 10 or more homes will be delivered, or the site has an area of 0.5 hectares or more.
- b) reducing the affordable housing target in Cranbrook to a level below the proposed targets for other towns in East Devon (please see comments under d) below). However, the proposed reduction to 15% is unlikely to provide any additional infrastructure funding because of the proposal to provide a dowry for the “suitable alternative natural greenspaces” (SANG) and because the shift from predominantly assisted purchase to predominantly social renting puts further pressure on funds available from development for infrastructure.

The Town Council questions the credibility of the viability testing which has led to the proposed reduction in the affordable housing target to 15%. The Council understands that the reason for reducing the affordable housing target locally was to release more funds for infrastructure which remains greatly underfunded – but the funding of SANGS and the shift to more social rent has eroded that.

The Town Council is concerned that the proposed reduction to 15% will not be sufficient to achieve sufficient funding for the delivery of future infrastructure appropriate for a town of circa 8,000 dwellings. To date the town has delivered high levels of affordable housing and this has been to the detriment of other infrastructure with many key elements being underfunded.

There is an urgent need to ensure that appropriate infrastructure is deliverable within the viability parameters of the development and that there is not a shortfall of funding in the same way as currently exists within the initial phases of the town.

- c) the affordable housing tenures of 70% social or affordable rent and 30% intermediate or other affordable housing.

However, considering that social and affordable rent represents a significant target proportion, Cranbrook Town Council highlights that East Devon District Council do not own any of their own council housing stock in Cranbrook, as it does in every other East Devon town. This deprives the local residents of the District Council's housing support services and the Town Council would value a response regarding how this unsatisfactory situation can be alleviated.

- d) Local Plan Strategy 34 which states that "on any development site affordable housing should be 'pepper potted' or dispersed throughout the scheme" in order to promote social cohesion and to create a mixed and balanced community.

However, in the case of the development at Cranbrook, this policy does not create a mixed and balanced community because of the disproportionate delivery of lower-banded properties across all sectors including market housing which has a knock-on effect on e.g. the precept the Town Council is able to generate in order to maintain its obligations and a resulting homogenous social demography across an entire town.

### **Recommendation**

To approve the Town Council's response to East Devon District Council's draft Affordable Housing Supplementary Planning Document (SPD).