

The Cranbrook Plan: Examination

Matter 11: Affordable Housing

Statement on Behalf of East Devon New Community
partners

Matter 11 – Affordable Housing

Issue 17: Is CB11 consistent with the EDLP and with National Policy on affordable housing?

Q142. Cranbrook plan housing provision is at variance with the EDLP. The EDLP indicates 25% affordable housing whereas CB11 substitutes a lower 15% figure (70% of which are affordable rent and 30% intermediate or other tenure). Is this reduced affordable housing provision justified and consistent with national policy? How far do viability issues influence this departure; especially coupled with Cranbrook being CIL exempt?

1. EDNCp have set out detailed and extensive representations at Regulation 19 stage and these have not been duplicated here. The key point is that the affordable housing provision is inextricably linked with the viability and deliverability of the development which is addressed in numerous other statements – most particularly in the Statement in relation to Matter 15. This should be referred to prior to consideration of the affordable housing policies to be included in the plan.
2. EDDC advance two reasons why the affordable housing provision is proposed to be 15%. On the one hand it is based on a viability assessment having regard to the infrastructure needs of the town (para 3.66 of the text).
3. On the other hand there is a recognised benefit in a policy objective to deliver a lower level of affordable housing provision in the expansion areas - in order to deliver a more diversified range of housing provision at Cranbrook given the very high levels of affordable housing delivery in the first Phase (3500 new homes) of Cranbrook's development (see para 3.69 of DPD). A moderated level of affordable housing provision was supported in consultation on earlier stages of the preparation of the Cranbrook DPD.
4. Notwithstanding the reduction in affordable housing provision from the 25% in the adopted Local Plan, EDNCp consider that the policy target of 15% remains unjustified and ineffective.
5. East Devon New Community partners have reviewed the evidence prepared by EDDC in relation to viability matters and have produced their own evidence paper on viability issues as part of their response to the Publication Draft of the Cranbrook DPD in detail in relation to Matter 15.
6. The anticipated extremely large section 106 contributions and the 15% affordable housing policy expectation are therefore unaffordable.
7. For the DPD to be viable it be necessary to:
 - reduce the expectations placed on the development in respect of affordable housing and other costs; and/or
 - reduce the expectations placed on the development in terms of infrastructure delivery and section 106 obligations.
8. Other additional options or variations exist including adjusting the tenure split (to a position where the majority is intermediate tenure) and producing savings on elements in the external costs that are policy based - CHP for instance.

9. This would be consistent with the NPPF by ensuring that the development proposed is deliverable and viable. The NPPF also allows for affordable housing to be 10% or less.

Q143. On what basis is a 15% affordable housing figure justified and effective?

10. See above and statement on Matter 15.

Q144. How will this level of affordable housing provision influence the provision of future infrastructure delivery and phasing?

11. See above and statement on Matter 15.

Q145. Should Policy CB11 reflect that 30% of AH is comprised "other affordable tenures" as defined within the Framework?

12. See above and statement on Matter 15.

Q146. Should Policy CB11 be updated with regard to intermediate housing given the more recent Framework wording?

13. See above and statement on Matter 15.

Q147. Would the requirements for affordable housing and other services and facilities impact upon the deliverability of housing expansion areas in the Plan?

14. Yes. See above and statement on Matter 15.

AQ17. Are any Main Modifications proposed in relation to Issue 17?

15. In the light of discussion that is necessary in relation to viability and cost Consideration will also need to be given to amend the DPD to refer a different tenure mix with intermediate tenures comprising a majority of the affordable housing elements and also a lower level of affordable housing provision.

16. In terms of detailed wording of the policy the following should be deleted from the policy:

- *"an overage clause will be sought ...where levels of affordable housing fall below the policy requirement"*
- the reference in para 5 to *"In periods of depressed markets"*
- the final sentence of the penultimate para *"any submitted viability assessment should be made publicly available"*