

Statement for the examination of the Cranbrook DPD

Response to the Inspectors Matters Issues and
Questions

Matter 11: Affordable Housing

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Contents

Issue 17: Affordable Housing	4
Q142 – Consistency with national policy	4
Q143 – Justification & effectiveness of target	6
Q144 – Infrastructure delivery & phasing	6
Q145 – Affordable tenures	7
Q146 – Intermediate housing	7
Q147 – Deliverability	7
AQ17 – Main modification	8

Issue 17: Affordable Housing

Response	Inspectors Question(s)
<p>1.1 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?</p>	<p>Q142 – Consistency with national policy</p>
<p>1.2 The NPPF advises in paragraph 34 that: ‘Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.’</p>	
<p>1.3 In addition paragraph 64 states that: ‘Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership.’</p>	
<p>1.4 CB11 balances the needs of infrastructure provision and meeting affordable housing need. The policy has been informed by the viability assessment in Cran063¹, which indicates that it will not be possible to</p>	

¹ <https://eastdevon.gov.uk/media/2760827/east-devon-cil-review-and-cranbrook-viability-report.pdf>

deliver the infrastructure required to mitigate the impacts of the planned development as well as providing the district wide affordable housing target. CB11 is the compromise between the two requirements.

1.5 The NPPF requires that plans should set out the contributions expected from development, including the levels and types of affordable housing provision required (para 34). PPG indicates that policies for planning obligations should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability (23b-004-20190901).

1.6 However, there is variance with EDLP strategy 34 which seeks 25% affordable housing in Cranbrook, although strategy 34 also acknowledges the role of viability in determining whether this target can be met as well as the balance between affordable housing and significant community benefits.

1.7 This approach mirrors the requirements of the National Planning Policy Framework (2018) and more particularly the legal requirement of the Planning and Compulsory Purchase Act 2004 paragraph 16 where it requires that plans must be prepared with the objective of contributing to the achievement of sustainable development and in addition should be aspirational but deliverable.

1.8 Housing and affordable housing does not in itself make a plan sustainable. It is the balance and interaction of homes and the environment, people and the opportunities available to them, layout and the nature of access, that all contribute to sustainability. In this regard the reduction of the affordable housing percentage evidenced here recognises the need for this balance and the lower level of affordable housing is justified.

<p>1.9 On what basis is a 15% affordable housing figure justified and effective?</p> <p>1.10 15% affordable housing is justified by the viability evidence. Cran063² section 6 provides information on the infrastructure costs required as part of the expansion of Cranbrook, as well as other Cranbrook-specific development costs. These costs drew upon specialist cost consultant advice which took account of the infrastructure requirements as well as the planned form of development.</p> <p>1.11 The viability testing took these costs into account and Cran063 table 6.8 (p43) summarises the viability findings with different levels of affordable housing provision. This shows that the proposed expansion of Cranbrook is not viable with 25% affordable housing.</p>	<p>Q143 – Justification & effectiveness of target</p>
<p>1.12 How will this level of affordable housing provision influence the provision of future infrastructure delivery and phasing?</p> <p>1.13 The reduced level of affordable housing will help to ensure that the planned development will be able to provide the infrastructure required for the expansion development planned at the appropriate time. Without the reduction in affordable housing there is a risk that development will not be able to provide the necessary infrastructure, or it may be provided later than needed.</p>	<p>Q144 – Infrastructure delivery & phasing</p>

² <https://eastdevon.gov.uk/media/2760827/east-devon-cil-review-and-cranbrook-viability-report.pdf>

<p>1.14 Should Policy CB11 reflect that 30% of AH is comprised “other affordable tenures” as defined within the Framework?</p> <p>1.15 Policy CB11 sets out the mix of affordable housing required in the town with a preferred mix 70% social and affordable rented accommodation and 30% intermediate or other affordable tenure. A suggested wording change in line with the most up to date NPPF is set out in the answer to Q146 below.</p>	<p>Q145 – Affordable tenures</p>
<p>1.16 Should Policy CB11 be updated with regard to intermediate housing given the more recent Framework wording?</p> <p>The NPPF describes affordable tenures as:</p> <ul style="list-style-type: none"> (a) Affordable housing for rent (b) Starter homes (c) Discounted market sales housing (d) Other affordable routes to home ownership <p>1.17 In order to reflect the current framework policy CB11 wording should be modified to read:</p> <p>1.18 Affordable housing tenure is sought as 70% social and affordable rented accommodation and 30% intermediate affordable home ownership or other affordable tenure.</p>	<p>Q146 – Intermediate housing</p>
<p>1.19 Would the requirements for affordable housing and other services and facilities impact upon the deliverability of housing expansion areas in the Plan?</p>	<p>Q147 – Deliverability</p>

1.20 Affordable housing and other service and facilities requirements have the potential to affect deliverability of the planned expansion areas:

- Service and facilities requirements for the expansion of Cranbrook have been determined in accordance with good place-making principles. These services and facilities will support housing delivery through increasing the attractiveness of Cranbrook as a place to live.
- Viability issues can affect deliverability. The evidence in [Cran063](#) has been used to explore the viability impact of affordable housing with infrastructure provision and this evidence has been used to set the requirements in a combination that mitigates the impacts of the development whilst providing affordable housing.

1.21 **Are any Main Modifications proposed in relation to Issue 17?**

AQ17 – Main modification

1.22 In order to reflect the current framework policy CB11 wording should be modified to read:

Affordable housing tenure is sought as 70% social and affordable rented accommodation and 30% ~~intermediate~~ **affordable home ownership** or other affordable tenure.