

Proposed response to the consultation on proposed changes to the NPPF

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<b>Affordable Housing</b>	
<p>Q1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national planning policy to include a wider range of low cost home ownership options?</p>	<p>The intention of Government to boost home ownership is supported. But home ownership is not an option for many local households in housing need, whether particularly because of a low or insecure household income (as demonstrated below) or because an individual is aged 40 or more or is not a first time buyer for example and needing to move to South Cambridgeshire to take up employment – and so not qualifying for a starter home. The NPPF requires local planning authorities to plan proactively to meet the housing needs of different groups in the community such as families with children, older people, people with disabilities, and service families amongst others. If starter homes are built on s106 sites as a replacement in whole or part for affordable rented homes, it will reduce the local authorities ability to assist households who are unable to afford or who do not qualify for a starter home. In recent years around 30% of households on our housing needs register have been in bands A and B (those with an urgent or high housing need), and these have made up the great majority of new affordable housing lets in the district.</p> <p>One drawback to starter homes as currently proposed is that unlike other alternative forms of affordable housing there is no provision to recycle the subsidy provided (the discount to full market value) into further affordable housing provision. Consideration should be given to ways in which all or some of the discount could be recycled to provide an ongoing local benefit rather than it only benefiting the first owner.</p> <p>It is important that future affordable housing is made up of a mix of products suitable for a wide variety of households which includes but is not limited to starter homes. In general a household income of around £50,000 would be needed to support home ownership of a £250,000 starter home locally. Property values are such that it is unlikely that a 2/3 bedroom home will be available in most of South Cambridgeshire at less than £250,000 without a</p>

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	<p>larger discount than 20%. The Strategic Housing Market Assessment for the Cambridge Sub Region 2013 records the following data on local household incomes:</p> <p>SCDC households      Lower quarter household income  Middle (median) household income      Average (mean) household income</p> <p>SCDC all households      £18,900      £36,150  £42,082</p> <p>SCDC recently moved social tenants household incomes (2009 to 2012 data)      £8,320      £13,944  £15,606</p> <p>It is therefore unlikely that the majority of households on an average income will not be able to afford a Starter Home and their needs will have to be met by alternative forms of affordable housing.</p> <p>With the withdrawal of grants for the provision of affordable housing delivery, and increasing issues of affordability generally (both in respect of house prices and rents) there is a need for new innovative housing products to come onto the market such as starter homes and rent to buy schemes. It is therefore positive that the Government is amending the definition of affordable housing to enable such provision. But there must be a balance between starter home provision and other forms of affordable housing to create sustainable communities and meet the housing needs of our area.</p> <p>In respect of starter homes consideration should be given to the affordable housing definition specifying that the household income of the first purchaser should not already be sufficient for them to buy a similar property in the same district on the open market. Without this provision the availability of starter homes would be reduced for those who could not otherwise be able to afford to buy in the district.</p> <p>The provision of a mix of affordable housing products is also important to the success of the local economy and the provision of public services. Many staff cannot afford home ownership even of starter homes and must be provided for if the economy and local services are not to suffer (including staff such as</p>

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	<p>nurses, and lab technicians). Labour mobility is important both to the local economic growth and for household income growth and career development. Home ownership can play a part in such mobility but is not the only answer. In this respect it is disappointing that there is nothing in the NPPF changes to encourage the growth of purpose built homes for rent by institutional investors, as well as of affordable rented and other intermediate products.</p> <p>Future funding for traditional affordable housing products is being squeezed by a lack of subsidy, competing s106 requirements, falling rents and in future by CIL, all of which support the need for innovative new affordable housing products being developed and introduced. Controlling future housing costs will have ongoing benefits for households and for the size of the housing benefit bill nationally.</p>
<p>Q2. Do you have any views on the implications of the proposed change to the definition of affordable housing on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?</p>	<p>The change to the definition in itself is unlikely to have significant implications. However, if the change results in significant changes to the nature of new affordable housing, there could be significant implications, see response at Q23.</p>
<b>Increasing residential density around commuter hubs</b>	
<p>Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?</p>	<p>The proposed change can be welcomed in relation to transport hubs planned for the new town of Northstowe (guided bus), and for Cambridge Northern Fringe East (guided bus, bus and new railway station), and also regarding the proposed Waterbeach new town if the railway station is relocated. These are all locations where increased residential densities would in principle be appropriate.</p> <p>We have rural railway stations in our district at Ashwell and Morden, Meldreth, Shepreth, Foxton, Shelford, Whittlesford and at Waterbeach. Some of these villages are small and are not otherwise well served in terms of facilities and services or alternative means of public transport.</p> <p>A number of villages on the guided bus routes in our district currently benefit from a 15 minute bus frequency although sometimes bus stops are not</p>

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	<p>always close to the village (Fen Drayton, Swavesey, Longstanton, Oakington, and Impington).</p> <p>For all these villages the proposed safeguard that would allow local densities to be set which take account of local character is very important and should be included in the final NPPF.</p> <p>The definition should include reference to guided bus systems such as that operating into Cambridge.</p>
<p>Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?</p>	<p>The guidance should be clear that rural locations on a commuter hub are not necessarily sustainable locations for development. It is only if they are sustainable locations for development that the policy on higher residential densities would apply, and then only after taking local character into account and the need to deliver high quality development.</p>
<p>Q5. Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?</p>	<p>Yes, a minimum suitable for inner London on a site next to a major railway station would be very different from one for a site next to a rural railway station next to a small village.</p>
<p><b>Supporting new settlements, development on brownfield land and small sites, and delivery of housing agrees in Local Plans</b></p>	
<p>Q6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?</p>	<p>Yes, It would be helpful if the NPPF could offer more support for new settlements. South Cambridgeshire is seeking deliver two new settlements through its Local Plan currently at examination. There is very little in the existing NPPF which supports the taking of strategic decisions of long term benefit to housing supply; the onus is on short term measures when what is needed are both. The evidence requirements for Local Plans in respect of new settlements in regard to transport, infrastructure and viability, and reasonable alternatives are onerous and are in some cases approaching what would be needed to support a planning application. A general statement that new settlements can offer a sustainable development solution would be very helpful. We are fully aware that developing further urban extensions on the edge of Cambridge in the Green Belt would on some measures be more sustainable, but we judge the overall balance to be less sustainable than new settlements when the harm caused to Green Belt</p>

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	<p>purposes by additional urban extensions is accounted for.</p> <p>Appropriate allowances must be provided for the lead in times of new settlements in regard to 5 year housing land supply calculations and the time necessary to make up any past undersupply where this has resulted directly from a failure of site promoters and developers to bring forward the development of new settlements in accordance with agreed timetables. If such allowances are not made some local authorities will continue to pursue purely short term solutions to future housing land supply.</p>
<p>Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?</p>	<p>Yes. The prioritisation of brownfield land for housing development can be supported in principle, provided that it is fully thought through. Is it intended to apply to large airfield sites for example which count as brownfield land and whose allocation as new settlements are currently key issues for decision through the Local Plan process?. A presumption in favour of development must allow proper consideration of sustainability including local employment land, and impact on the wider development strategy for the area.</p> <p>The South Cambridgeshire Local Development Framework and Submitted Local Plan already positively supports appropriately scaled development within settlement boundaries. However, in the smallest villages (Infill Villages), with fewest facilities, development is restricted to sites of two dwellings (where not using a brownfield site where 8 dwellings can be developed). An assumption in favour of development of sites of 10 dwellings could increase the scale of development taking place in the least sustainable locations. Consideration should be given to reducing the permissible scale of development to a figure less than 10 in villages at the lowest scale of settlement hierarchy set out in a Local Plan.</p> <p>The proposal to allow small sites adjoining settlement boundaries to be developed for residential would be likely to lead to a significant amount of village development with impacts on the landscape setting of many villages. The new Local Plan policies envisaged by question 10 must be able to take</p>

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	<p>account of village sustainability as well as landscape impact. The NPPF needs to be clear what is meant by small in this context, the impact would be less if the sites are clearly stated to be for less than 10 dwellings.</p> <p>The relationship between this change and that proposed by question 17 (starter homes on rural exception sites) is important. Allowing market housing development adjoining settlement boundaries as is proposed will be likely to bring more village land onto the market for housing development, but also blur the difference between such sites and rural exception sites. It may reduce the amount of rural exception site affordable housing coming forward as the local benefit is less direct.</p>
<p>Q8. Do you consider that it would be beneficial to strengthen policy on development of small sites for housing? If not, why not? How could the change impact on the calculation of the local planning authorities' five-year land supply?</p>	<p>Yes. If such changes were to be made to the NPPF it would be reasonable to include an allowance for such development in the windfall allowance making up overall housing supply and hence calculation of 5 year housing land supply.</p> <p>If enough land is made potentially suitable for housing development through the NPPF changes, calculating future 5 year housing land supply will become both more difficult and less relevant.</p>
<p>Q9. Do you agree with the Government proposal to define a small site as a site of less than 10 units? If not, what other definition do you consider is appropriate, and why?</p>	<p>Yes.</p>
<p>Q10. Do you consider that national planning policy should set out that local planning authorities should put in place a specific positive local policy for assessing applications for development on small sites not allocated in the Local Plan?</p>	<p>As the consultation document states, most plans are already positive towards appropriate windfall development within settlements, and are an important element of housing supply already sought by Local Planning Authorities in light of the current NPPF.</p> <p>The proposal to allow small sites adjoining settlement boundaries to be developed for residential would need a specific local policy to balance support for such provision with protection of local amenity, heritage and the environment.</p>
<p>Q11. We would welcome your views on how best to</p>	<p>It will be important that any policy response allows area specific circumstances to be taken into account</p>

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<p>implement the housing delivery test, and in particular:</p> <ul style="list-style-type: none"> <li>• What do you consider should be the baseline against which to monitor delivery of new housing?</li> <li>• What should constitute significant under-delivery, and over what time period?</li> <li>• What steps do you think should be taken in response to significant under-delivery?</li> <li>• How do you see this approach working when the housing policies in the Local Plan are not up-to-date?</li> </ul>	<p>regarding the most appropriate response to a shortfall.</p> <p>The proposed remedies to under delivery are already available to local planning authorities. It is unclear they would be more successful than existing national policies intended to boost housing delivery have been such as the 20% additional site buffer and the penalties which flow from not having a 5 year supply of deliverable sites.</p> <p>Consideration should be given to remedies which would incentivise developers as well as local planning authorities. These could include a land tax on non delivering sites, and enabling the HCA and local councils to acquire and deliver non performing sites.</p> <p>A specific mechanism should be introduced through legislation and the NPPF to enable additional housing sites to be added to an adopted Local Plan to ensure a 5 year housing land supply. The mechanism should be such as to allow for the process to be rapidly completed. The review of our Local Plan started in 2011, has been at examination since March 2014 and until its adoption we will not be able to demonstrate a 5 year housing land supply.</p> <p>It is also difficult to see how the NPPF providing a more supportive policy towards new settlements can be consistent with introduction of a housing delivery test given the long lead in times of new settlements and the risks involved in their delivery. Adding a new settlement to a Local Plan in response to failure of the under delivery test would be very unlikely to provide a quick solution.</p> <p>New settlements should be discounted from the housing delivery test given these uncertainties which are primarily in the control of the promoter and site developers rather than the local planning authority.</p>
<p>Q12. What would be the impact of a housing delivery test on development activity?</p>	<p>No response.</p>
<b>Supporting delivery of starter homes</b>	
<p>Q13. What evidence would you suggest could be used to justify</p>	<p>Through recent government consultations, the Council has stressed the need to protect village</p>

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<p>retention of land for commercial or similar use? Should there be a fixed time limit on land retention for commercial use?</p>	<p>employment sites. These are an important part in maintaining viable rural communities. It is acknowledged that a balance must be struck between protecting sites and applying long term protection where there is no reasonable prospect of take up. Our Local Plan already allows for commercial and employment land within villages to move to residential use subject to appropriate policy tests including evidence of marketing for a minimum of 12 months. Changes to the NPPF must allow Local Planning Authorities to continue to protect this important resource, and not create unreasonable evidence requirements.</p> <p>Partial residential development of employment sites could undermine existing employment functions by other occupiers. There are also risks of landlords displacing firms to seek residential development, given the potential difference in land values.</p> <p>National policy must make provision to ensure that the employment areas of new settlements are not vulnerable to being lost to residential use based on inappropriate policy tests. New settlements can deliver over periods of over 20 years and some employment land may not be delivered until towards the end of this period. For new settlements it would be inappropriate to allow the loss of employment land based on the length of time a site has been undeveloped or lack of evidence of market interest delivering development within two years.</p>
<p>Q14. Do you consider that the starter homes exception site policy should be extended to unviable or underused retail, leisure and non-residential institutional brownfield land? <i>(such as schools and hospitals)</i></p>	<p>The loss of such sites in a village context can have serious implications for local employment and village sustainability. In the case of the village of Papworth Everard in South Cambridgeshire plan policy seeks to ensure that a existing hospital site is maintained in either healthcare use or as employment land and does not provide for future residential use. The future use of such sites is most appropriately dealt with locally where the impacts of policy on a locality can best be judged.</p> <p>This proposed change in combination with the proposal to allow more flexibility in the redevelopment of brownfield sites in the Green Belt (Question 20) could result in proposals to redevelop garden centre</p>



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	sites in the Green Belt for starter homes and open market residential.
Q15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?	See the answers to questions 13 to 18.
Q16. Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?	<p>No response.</p> <p>This policy change is primarily aimed at struggling town centres rather than to the type of village centres found in South Cambridgeshire. The Local Plan already allows for such changes of use where there would not be an unacceptable reduction in village services and facilities, and subject to viability and marketing criteria.</p>
Q17. Should rural exception sites be used to deliver starter homes in rural areas? If so, should local planning authorities have the flexibility to require local connection tests?	<p>The practical results of this proposed policy change are uncertain. It could lead to some landowners not making their land available for rural exception sites as the starter home residents would not necessarily have any local connection given that such a test is seen as exceptional and not of general application. Starter homes are subject to a 20% discount for the buyer which does not have to be recycled for subsequent purchasers after 5 years of residency. This gift from the landowner to purchasers with no local connection may make some landowners reluctant to make their land available for such developments. Local communities are unlikely to support proposals without a guarantee of perpetuity and local connection criteria. Experience of shared ownership sales on rural exception sites demonstrates that often purchasers do not come forward with a local connection and cascade provisions have to be implemented. This is likely to be exacerbated if all homes on rural exception sites are starter homes. It is also unclear whether you would still need to evidence the need for starter homes in line with existing policies on rural exception sites.</p> <p>There is also some concern that a wholly exception site of starter homes will mean that the affordable housing asset targeted for local people will be lost as soon as the properties are sold on, resulting in a loss of affordable housing in rural areas. Village sites are often constrained and cannot grow in perpetuity, this would support a different approach to starter homes</p>

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	<p>on exception sites such that the 20% discount is retained in perpetuity.</p> <p>There would also appear to be a contradiction in terms of legislation where the Housing (Right to Acquire or Enfranchise) (Designated Rural Areas) was implemented to ensure affordable homes in specified areas was not lost to the open market.</p> <p>A local connection test must remain an option for inclusion in Local Plans and not as an exception.</p>
<p>Q18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?</p>	<p>No comment.</p>
<p>Q19. Should local communities have the opportunity to allocate sites for small scale starter home developments in their Green Belt through neighbourhood plans?</p>	<p>The NPPF at paragraph 89 already allows limited affordable housing for local community needs in the Green Belt. Extending this exception to starter homes may be attractive to some villages who see a need for some low cost market homes in the village but not for additional affordable homes.</p>
<p>Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact on openness?</p>	<p>Existing national policy requires that the development of such sites not have a greater impact on the openness of Green Belt land than the existing development on site. This can sometimes lead to it not being viable to redevelop such sites where contaminated or occupied by significant industrial structures. Provided that the development enabled is suitable, sensitively designed and the impact on openness is not substantial such a change would not have any major impact on the purposes of the Cambridge Green Belt.</p>
<b>Transitional arrangements</b>	
<p>Q21. We would welcome your views on our proposed transitional arrangements (<i>which only relate to the affordable housing definition</i>)</p>	<p>No comments.</p> <p>The South Cambridgeshire Local Plan has been submitted for examination. The Local Plan Inspector is able to require changes to the affordable housing policy and definition where necessary to make the plan sound.</p>
<b>General questions</b>	
<p>Q22. What are your views on the assumptions and data sources set out in this document to estimate the</p>	<p>The impact on local authorities' ability to discharge their duties in terms of homelessness has not been assessed in terms of the availability of new homes meeting this client group's needs. Further analysis</p>

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impact of the proposed changes? Is there any other evidence which you think we need to consider?	on the current allocation of new affordable homes should be investigated to understand the impact on future allocations.
Q23. Have you any other views on the implications of our proposed changes to national planning policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?	<p>If the proposed change in the definition results in a decrease in the supply of rented homes, it is likely there will be an adverse affect on people with a disability or long term illness. 27.7% of applicants for rented homes in South Cambridgeshire have indicated they have a disability or long-term illness; but this is true for just 4.4% of applicants for low cost home ownership.</p> <p>If the change results in a decrease of rented homes in South Cambridgeshire, people aged over 40 will be adversely affected. In 2015 (to date) 38.4% of social/affordable lets were to over people aged over 40.</p>