

Home Builders Federation

Representor Number 412

Hearing Session: Issue 6

## ASHFORD LOCAL PLAN EXAMINATION

**Issue 6: Is the overall target for affordable housing and the type of tenure justified? Does the Local Plan make adequate provision for specialist housing?**

*i) Has the need for affordable housing in the Strategic Housing Market Assessment (SD13) been calculated in accordance with paragraphs 022 to 028 of the PPG on Housing and economic needs assessments (ID02a)?*

No comment

*ii) In Policy HOU1 what is the justification for departing from national policy in the Written Ministerial Statement of November 2014 and referred to in the PPG on Planning Obligations (ID23b-031-20160519) regarding the site thresholds for affordable housing?*

In paragraph 5.5 the Council refers to the Housing White Paper (HWP) with regard to the definition used by Government in relation to the types of site expected to bring forward affordable home ownership products. The recent consultation on the Draft NPPF refers to the exemption from affordable housing to apply to major sites. The definition in PPG also reflects the definition of major development as defined in regulation<sup>1</sup> and includes buildings that are 1,000sqm or more – which is consistent with PPG. In order to maintain consistency and avoid confusion site thresholds in this policy should reflect the more detailed definition set out in PPG.

*iii) Are the percentages sought for the 3 different areas of the Borough for the total affordable housing requirement and the different types of tenure justified? Are the boundaries of the different areas properly defined?*

As we have commented in our response to Issue 3 question iv) we are concerned that that the affordable housing requirement will push development to the margins of what is viable. There is a risk that the with other policy requirements and the costs of infrastructure either through S106, S276 or CIL will require the Council to negotiate affordable housing provision and/ or other policies on a significant proportion of development coming forward through this local plan. At present it is not clear as to the additional infrastructure costs that may be placed on development. At present the viability assessment includes S106 costs of £2,000 per property. This is for informal open space, play areas and minor local transport improvements. This does not include critical or essential infrastructure such as schools and highways. For example, the Infrastructure

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<sup>1</sup> Regulation 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015

Delivery Plan (SD10) estimates the current cost of delivering the essential expansion of primary and secondary schools is £84m and when combined with other costs relating to infrastructure defined by the Council as being essential and critical to the delivery of the plan could increase development costs significantly. Whilst it must be expected that some of these costs will come from other sources there is likely to be a substantial funding gap. It would appear from the infrastructure delivery schedule in section 3 of SD10 that the Council's expectation is that planning obligations/ CIL will be required to pay for a considerable proportion of any infrastructure costs and could lead to higher than anticipated infrastructure costs. In order to accommodate such costs the Council must create more headroom by reducing the other policy costs being placed on new development. If not negotiation on affordable housing contributions in particular will be required on a case by case basis – a situation the Government is seeking to avoid in future.

*iv) Does the Local Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community as set out in paragraph 159 of the NPPF?*

No comment

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