

APPENDIX E – POLICY H5 (AFFORDABLE HOUSING)

RESPONSES TO PROPOSED POLICIES

CHAPTER: 6	POLICY NUMBER: H5	POLICY NAME: Affordable Housing
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENT ID	RESPONDENT NAME
(1) Support the overall approach to affordable housing				
[Support policy as currently drafted, noting further details are required]	Noted	No change	92; 135; 232; 245; 256; 641	Ashby de la Zouch Town Council; Strata Ltd (Marrons); Stantec UK Ltd (Caddick Land); Evolve Planning (Bloor Homes); Evolve Planning (Cameron Homes); emh
[Support the overall approach and request that percentage requirements should be no lower than in the current adopted Local Plan]	Noted. Percentage requirements will follow after whole-plan viability testing.	Policy requirements to be updated following whole plan viability assessment	92	Ashby de la Zouch Town Council
[Support / acknowledge the Council's intention to undertake a viability study before setting the final affordable housing figure as well as tenure mix]	Noted	No change	147; 150; 184/193; 211; 216; 232	Gladman Developments Ltd; Savills (David Wilson Homes East Midlands); Pegasus Group (Hallam Land Management); Pegasus Group (Davidsons); Pegasus Group (Westernrange);

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				Stantec UK Ltd (Caddick Land); Pegasus Group (Davidsons & Westernrange)
(2) Requests for further details and suggestions for viability testing				
[Given lack of detail such as percentage requirements and tenure mix in the draft Regulation 18 policy, unable to comment on the onsite provision of affordable housing and reserve right to review and comment on updated wording of Policy H5 once available at Regulation 19 stage]	Noted. Percentage requirements will follow after whole-plan viability testing.	Policy requirements to be updated following whole plan viability assessment	135; 183; 214; 237	Strata Ltd (Marrons); Turley (Clowes, Redrow, Wilson); Stantec UK Ltd (Bloor Homes Midlands and Taylor Wimpey Strategic Land); Home Builders Federation
[Difficult to ascertain whether the policy is realistic or deliverable. By limiting scrutiny of a viability study, concern that the Council is reducing opportunities for comment of crucial component of evidence base which underpins the deliverability of the Local Plan]	Noted. It is not uncommon for whole-plan viability testing to be undertaken after the Regulation 18 consultation has taken place. There will be further round of consultation at the Regulation 19 stage, which will provide opportunity to comment on the affordable housing percentage requirements and any related evidence base documents.	Policy requirements to be updated following whole plan viability assessment	553	The Planning Bureau Ltd (McCarthy Stone)
[Affordable housing requirement should not be set so high that negotiation is needed on every site. Policy should be flexible to accommodate viability, site specific	Noted	Policy requirements to be updated following whole plan viability assessment	147; 150; 161; 214; 237	Gladman Developments Ltd; Savills (David Wilson Homes East Midlands); Mather Jamie (the Whatton

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feasibility and commercial realities, rather than a blanket approach]				Estate); Stantec UK Ltd (Bloor Homes Midlands and Taylor Wimpey Strategic Land); Home Builders Federation
[Viability testing should take account of full range of matters that affect viability including new mandatory BNG requirements, changes in building regulations, and other policies in the draft Local Plan]	Noted. The Local Plan viability study will consider the overall costs of development (including infrastructure costs, mandatory BNG requirements and the latest building standards / regulations).	Policy requirements to be updated following whole plan viability assessment	184/193; 235	Pegasus Group (Hallam Land Management); Pegasus Group (Davidsons & Westernrange)
[Affordable housing policy may need to consider prioritising affordable housing over seeking higher standards]	Noted. The Local Plan viability study will consider the overall costs of development (including infrastructure costs, mandatory BNG requirements and the latest building standards / regulations).	Policy requirements to be updated following whole plan viability assessment	184/193; 235	Pegasus Group (Hallam Land Management); Pegasus Group (Davidsons & Westernrange)
[Policy requirements should be flexible on sites which deliver 100% affordable housing, due to the more marginal viability of these sites. This should be considered as part of viability assessment typologies].	Noted. The viability study must take a proportionate approach to the consideration of different development scenarios. 100% affordable schemes are not that commonplace in the district and the Local Plan does not allocate any such sites. In these circumstances, testing this particular typology though the viability assessment is not considered to be necessary	Policy requirements to be updated following whole plan viability assessment	296	Pegasus Group (emh)
[Older person’s housing typologies should be assessed separately in forthcoming Local Plan Viability Study,	Noted. The necessity for this will be considered as part of the viability work.	Policy requirements to be updated following	553	The Planning Bureau Ltd (McCarthy Stone)

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this would accord with PPG guidance on a typology approach. Affordable housing requirements are inappropriate when considering such housing need]		whole plan viability assessment		
(3) Need for variation and flexibility in application of affordable housing policy requirements across the District				
[Support for a higher affordable housing requirement in locations north of District adjacent to major existing / planned employment sites]	Noted. The Council is considering whether and how affordable housing requirements should be varied in different parts of the district. This will to help sustain existing and future businesses by boosting local labour supply.	Policy requirements to be updated following whole plan viability assessment	92	Ashby de la Zouch Town Council
[A bespoke approach should consider the varying affordable housing requirements in different parts of the district, including the International Gateway area]	Noted. The Council is considering whether and how affordable housing requirements should be varied in different parts of the district, to help sustain existing and future businesses by boosting local labour supply.	Policy requirements to be updated following whole plan viability assessment	341	Leicestershire County Council
[Degree of flexibility requested when applying affordable housing requirements where site is adjacent to one settlement but falls within the affordable housing designation of another]	Noted. A balance needs to be struck between making the policy requirements clear and succinct and offering an appropriate degree of flexibility. It is considered that the circumstances set out in this comment are too specific to merit a wording change.	No change.	147	Gladman Developments Ltd
[The affordable housing policy should include a site size threshold at which point affordable housing would be	As per para 6.27. of the Regulation 18 Local Plan consultation document, affordable	Policy requirements to be updated following	207	Satplan (Metacres Ltd)

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required. The policy as currently drafted could cause ambiguity]	housing is only required on developments above a certain size. The affordable housing policy in the adopted plan includes different site size thresholds according to whether the application is for a greenfield or brownfield site. For this new plan, our working assumption is that the threshold will be set at sites of 10 or more dwellings (or 0.5ha) in line with the National Planning Policy Framework (NPPF). Any change to this position will be confirmed as part of the Regulation 19 Local Plan publication and consultation.	whole plan viability assessment		
[Strongly believe that a lower provision of affordable housing, or a deviation from the HENA mix, should be acceptable if there is very little or no RP interest in / support for a site]	The purpose of Policy H5 is to set out policy requirements for provision of affordable housing across the District. This drives certainty and long-term confidence for Registered Providers going forward through the next plan period. It is therefore not appropriate to lower the provision of affordable housing due to a potential lack of interest from a RP at a certain point in time.	No change	35	Strata Ltd (Marrons)
(4) General comments on affordability and housing supply targets				
[Suggestion that 56% of new homes need to be affordable, noting that over	The Council’s approach to affordable housing is consistent	Policy requirements to be updated following	175	Oakthorpe, Donisthorpe &

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past 6 years only 18% of completions have been affordable. Concern regarding affordability for local young people and lower paid workers]	with national planning policies set out in the NPPF and includes a range of tenures including: <ul style="list-style-type: none"> - Affordable housing for rent; - Discounted market sales housing; and - Other affordable routes to home ownership, including shared ownership. All of these routes would be available to local young people and lower paid workers who meet the relevant criteria.	whole plan viability assessment		Acresford Parish Council
[Scale of affordable housing need reinforces importance of applying an appropriate buffer to the housing requirement and a greater supply of housing sites to meet needs]	The Council is providing a level of housing above its requirement which will provide sufficient flexibility.	No change.	184/193	Pegasus Group (Hallam Land Management)
[Due to inconsistencies between the HENA, LHNA and Standard Method, it is considered that the overall housing need figures will need to be reviewed further]	The overall housing requirement is based on appropriate evidence with the Local Housing Need as a starting point.	No change	214	Stantec UK Ltd (Bloor Homes Midlands and Taylor Wimpey Strategic Land)
[Affordable housing needed for new couples starting out and older couples wanting to downsize]	The Council's approach to affordable housing is consistent with national planning policies set out in the NPPF and includes a range of tenures including: <ul style="list-style-type: none"> - Affordable housing for rent; - Discounted market sales housing; and 	No change	175	Oakthorpe, Donisthorpe & Acresford Parish Council

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	<ul style="list-style-type: none"> - Other affordable routes to home ownership, including shared ownership. <p>All of these routes would be available to residents who meet the relevant criteria.</p>			
<p>[The definition of affordable covers a number of tenures. The area that has been falling behind nationally has been the proportion of homes for rents that are social/affordable. Significant numbers of Shared Ownership have hidden the numbers of 'rental' properties that are brought to the market. It would be useful to see this presented more clearly]</p>	<p>The Council's approach to affordable housing is consistent with national planning policies set out in the NPPF and includes a range of tenures including:</p> <ul style="list-style-type: none"> - Affordable housing for rent; - Discounted market sales housing; and - Other affordable routes to home ownership, including shared ownership. <p>Delivery of affordable housing is reported annually in the Local Authority monitoring report.</p>	No change	651	Amanda Hack (rep submitted before she became an MP)
<p>[Question over whether young people will be able to afford new homes]</p>	<p>The Council's approach to affordable housing is consistent with national planning policies set out in the NPPF and includes a range of tenures including:</p> <ul style="list-style-type: none"> - Affordable housing for rent; - Discounted market sales housing; and - Other affordable routes to home ownership, including shared ownership. 	No change	414	Emily Massey

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	All of these routes would be available to young people who meet the relevant criteria.			
(5) First Homes				
[First Homes price cap of £250k seems too high, this would not be affordable]	First Homes are no longer required through National Policy so will not be taken forward	References to First Homes to be removed.	289	Swannington Parish Council
[Support period of three months for First Homes Local Connection Criteria, as any longer will restrict the availability of affordable homes to those in need]	First Homes are no longer required through National Policy so will not be taken forward	References to First Homes to be removed.	232	Stantec UK Ltd (Caddick Land)
[The proposed Local Connection Criteria is supported, as this will provide a further lever to encourage greater co-location of homes and jobs in key areas such as the International Gateway]	First Homes are no longer required through National Policy so will not be taken forward	References to First Homes to be removed.	341	Leicestershire County Council
(6) Integration of affordable housing within design and layout of schemes				
[It is suggested that point (4) of the draft policy H5 should be modified to state along the lines that “ <i>the location of affordable housing provision within sites shall have regard to any existing or proposed active travel or passenger transport provision within or surrounding the site</i> ”, given that affordable dwellings are less likely to have access to a private car than market housing and therefore will be more reliant on such modes to provide essential access to key jobs and services/facilities]	While this is a design consideration, provision of active travel routes and public transport accessibility is a key consideration for the provision of <i>any</i> housing schemes to encourage modal shift towards sustainable transport modes.	No change	341	Leicestershire County Council

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(7) Link to Education planning				
<p>[Clarity over affordable housing numbers impacted by this policy will provide greater understanding when calculating pupil yield which can often be greater with affordable housing. Affordable housing may impact viability which may have a detrimental effect on the provision of pupil places. Therefore, the quantity of affordable housing may impact education infrastructure]</p>	<p>Noted. Consultation with education providers is ongoing as part of the Local Plan process.</p>	<p>No change</p>	<p>341</p>	<p>Leicestershire County Council</p>

Draft Policy H5 – Affordable Housing (Strategic Policy)

- (1) Affordable housing will be provided on site as part of major residential (Use Class C3) and mixed-use developments as follows:
 - (a) *[Percentage requirements will follow after whole-plan viability testing]*
 - (b) *[Tenure mix will follow after whole-plan viability testing]*
- (2) Off-site provision will be accepted only where it is demonstrated that the circumstances set out in the NPPF (or its successor) are met.
- (3) A lower proportion of affordable housing will only be accepted where a viability assessment, prepared in accordance with national planning policy and guidance, clearly demonstrates that the full policy requirement cannot be achieved.
- (4) The affordable housing should be integrated within the design and layout of the scheme such that they are externally indistinguishable from market housing on the same site.
- (5) Schemes which artificially reduce the scale of development to avoid the requirement for affordable housing, for example by sub-dividing a site or by not achieving efficient use of land, will not be acceptable.
- (6) ~~The Council's Local Connection Criteria will apply to prospective purchasers of a First Home for a period of three months from the date the property comes onto the market.~~