

SDNP Affordable Housing SPD Consultation (November 2019)

Comments made by John Kay on behalf of:

CPRE Sussex

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CPRE Sussex supported the principles underpinning policies SD27-SD29 in the adopted Local Plan, and broadly supports the approach of the SPD. In particular we welcome the support for the delivery of rural affordable housing on Exception Sites and via Community Land Trusts.

Specifically CPRE Sussex supports:

- The landscape-led approach to the identification of all housing sites, including exception sites [para.2.1].
- The approach to establishing whether units in retirement villages or extra-care developments should be classified as C2 or C3 [paras.2.6-2.11 & 2.27]. We note however that retirement villages are distinguished by very high service charges to cover the costs of facilities provided for residents, unaffordable to affordable housing providers, so that this might be an additional type of development in which separate, or off-site, provision of affordable housing might be appropriate.
- The 40% discount proposed for any discounted market sales housing included within the affordable element of a development [para 2.12].
- The recognition that there are essential rural workers other than those employed in agriculture and forestry [para.2.40].

However, there are two areas in which we believe further consideration is required:

Rural exception sites

Neither the Feb 2019 NPPF nor the SDNP Local Plan policy SD29 insists on 100% affordable housing delivery on exception sites. It is CPRE Sussex's view that attempting to insist on this in this SPD will prove counter-productive, especially to delivery via CLTs. We strongly recommend that the options included in Local Plan para. 7.78 should also be referenced in this SPD.

Affordable housing to be delivered and managed by CLTs

This SPD does not appear to appreciate that CLTs are much more than small-scale, locally-managed, unregistered housing associations. They are established by a local community to seek to meet those of that community's housing needs that are perceived by the community as unmet by existing provision. CLTs will differ as much from each other as those communities differ from each other. CLT members and the landowners prepared to make their land available are driven by a wide range of motives. It is essential that this SPD recognises both the essential local character and the diversity behind the enthusiasm driving delivery of CLT housing. Several of the requirements of this SPD and its associated draft s.106 agreement seek to impose a uniformity that would, if applied to CLTs, be counter-productive because they would destroy that enthusiasm.

To give just three important examples:

1. CLTs will wish to establish their own criteria for prioritising tenancy allocations, and these criteria will be determined democratically by the CLT membership. While unmet housing need, as defined in the NPPF, will be essential, few CLTs will accept their tenants being nominated by the Local Housing Authority as is proposed throughout this SPD and in its associated draft s.106 agreement. A key difference between the Local Housing Authority and a CLT seems not to be appreciated. While the LHA must by law prioritise those in the greatest housing need, a CLT may well also seek to balance individual housing need with the need of that specific community to house the residents whose contributions it needs.
2. In the same way CLTs will wish to determine, democratically by their membership, their own criteria for 'local connection'. They will not expect or accept this being imposed externally by policies such as those proposed in paras.2.19-2.20.
3. Again, CLTs will wish to determine, democratically by their membership, the types of tenancies that they will offer. While they will always seek to be good and fair landlords they will not necessarily accept being required to offer such leases as are specified in para.1.10 of the draft s.106 agreement, nor will they necessarily wish to prohibit tenants taking in lodgers, if the lodgers need local housing and the tenant's circumstances make such action necessary, for example, to avoid the bedroom tax.

If the SDNP wishes to see CLTs flourish in its area, and make the full contribution to meeting local housing need that they are capable of making, it must simplify the SPD (as far as CLTs are concerned) to avoid such over-prescriptive and counter-productive disincentives to their establishment and operation.