

Planning Application Comments

**Planning Application Number:** 21/01630/OUT

**Site Name:** Land at NW Bicester, Home Farm, Lower Farm and SGR2, Caversfield

**Planning Officer:** Caroline Ford

**Date of Comments:** 04 August 2021

**Comments by:** Frances Evans (Housing Strategy & Development Team Leader, Cherwell District Council)

**Summary of Strategic Housing Consultation Response**

This site is within Policy Bicester 1 Allocation and forms part of the NW Bicester Eco Town Masterplan, supported by the North West Bicester Supplementary Planning Document 2016 which sets out the key requirements of this development along with Local Plan Policy BSC3, BSC4 and the Developer Contribution SPD.

As the application documents do not confirm that the affordable housing proposals will meet all of the policy requirements, it is not possible to support this application without further detail and viability information.

**Affordable Housing Proposals in the Planning Application**

The outline planning application seeks approval for residential development with all matters reserved except for access. The planning application form indicates that the proposed development will comprise of 530 dwellings of which there will be 371 market dwellings and 111 (approx. 70%) social or affordable rent and 48 (approx. 30%) affordable home ownership dwellings.

The accompanying Affordable Housing Statement (dated 21 April 2021 – prepared by Pioneer Property Services Ltd), sets out that achieving 30% affordable housing on this site will be challenging but goes on to suggest that subject to viability testing, there will be 30% affordable housing split as 50% Affordable Rent and 50% Intermediate Housing.

The AH Statement provides an indicative affordable housing dwelling mix as follows but sets out that this mix is *subject to viability and further discussion with the District Council*:

| <b>Property Type</b> | <b>Affordable Rent</b> | <b>Shared Ownership</b> |
|----------------------|------------------------|-------------------------|
| <b>1 bed flat</b>    | 27%                    | 0%                      |
| <b>1 bed FOG</b>     | 4%                     | 0%                      |
| <b>2 bed flat</b>    | 16%                    | 0%                      |
| <b>2 bed house</b>   | 4%                     | 9%                      |
| <b>2 bed house</b>   | 25%                    | 53%                     |
| <b>3 bed house</b>   | 15%                    | 33%                     |

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|                       |      |      |
|-----------------------|------|------|
| <b>4 bed house</b>    | 7%   | 0%   |
| <b>4 bed bungalow</b> | 2%   | 0%   |
| <b>4 bed bungalow</b> | 0%   | 5%   |
| Total                 | 100% | 100% |

The conclusion to the Affordable Housing Statement sets out that:

- 1) If approved, the outline application will enable ... “a viable quantum of affordable housing”.
- 2) “The baseline position for Affordable Housing is provision at 30% and provides a starting point for consideration through the viability assessment submitted in support of this planning application in accordance with the Development Plan”.
- 3) A 50:50 rented /sale affordable housing tenure split on the basis of Pioneer Property Service’s analysis of the SHMA and other data.
- 4) Subject to viability and discussion with the Council, affordable housing will be built in accordance with the adopted Plan policy in respect of sustainable construction and Policy Bicester 1. The ability to achieve the Council’s requirements set out in the Developer Contributions SPD in relation to meeting Nationally Described Space Standards and an element of affordable housing to be constructed to Building Regs Part M4 (2) and M4 (3) will be subject to viability and discussion with the Council.
- 5) Achieving ‘true zero carbon’ status across the homes along with other obligations has significant viability implications.

**Strategic Housing Response**

I have not seen the viability assessment and therefore can only comment on the proposals put forward with the application documentation.

As there are so many key requirements being left ‘subject to viability and discussion with the council’, it is difficult to support this application without the additional viability details and confirmation of what will be included in the S.106 Heads of Terms.

Enabling the provision of genuinely affordable housing, having regard to local incomes and house prices/rents, is a priority for the council. The adopted Local Plan Policies BSC3 and BSC 4 support this and set out the council’s affordable housing requirements including tenure split and the need for a mix of property types. The Developer Contribution SPD (DCSPD) sets out the requirements for affordable dwelling size standards, accessibility and clustering on sites. Whilst the DCSPD is not embedded within the Local Plan, it is an adopted document and a material consideration, especially as it has been in place for some years.

In addition, the adopted Local Plan Policy Bicester 1 Supplementary Planning Document 2016 i.e. Appendix 2 (ET9), sets out that the site should provide Social Rent tenure as well as affordable intermediate housing, and homes built to Lifetime Homes and space standards, and energy efficiency levels.

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The application proposes Affordable Rent rather than Social Rent and does not commit to the policy requirements being met in full nor how the affordable housing will be delivered i.e. phased development, clustering etc. The absence of these details makes drafting Head of Terms difficult to achieve.

### **Housing Need and Affordable Housing Mix**

The affordable housing would need to be split proportionately across the phases of the development and with tenure proportions representing a 70/30 split between Social Rent units and Intermediate units (defined by NPPF). There is a lack of new supply of social rented homes which is the most affordable housing option for the majority of households on the Council's Housing Register. Appendix 2 and Appendix 3 of the draft Tenancy Strategy and Affordability Statement (currently out for consultation) helps to set out the data on affordability and why social rent is the priority need. The draft tenancy strategy and affordability statement along with a Consultation Document can be found here: <https://www.cherwell.gov.uk/info/55/strategy-policy-and-development/823/tenancy-strategy>

In terms of the indicative dwelling mix, I have looked at the housing register data and the pipeline of affordable housing supply. Consideration should also be given to the changes in housing need impacted by the Covid-19 pandemic i.e. households needing independent or larger accommodation and the need for rented accommodation to be more affordable. Whilst approximately 47% of households on our housing register currently require 1-bed accommodation, there is a smaller but more acute need for larger 4-bed+ social rented homes in the district (i.e. around 84% of all households on the register who need 4+ bedroom accommodation are in housing need Band 2). With additional provision of 4-bed houses, this may enable mobility in social housing where overcrowded households can move to larger family homes, freeing up their 3-bed accommodation. Recent planning applications will enable an increase in the future provision of 1 and 2-bed flats in Bicester, therefore the provision of good quality family accommodation with private outdoor space will be important to provide a mix and balance across the Bicester area.

In pre-application comments, the Strategic Housing Officer indicated that a mix of 30% 1-beds, 45% 2-beds, 20% 3-beds and 5% 4-bed accommodation, would contribute towards meeting some of the identified need although this was an initial proposal and the exact mix would need to be formally agreed. The suggested mix was also to include at least 50% of the rented dwellings to meet Building Regulations Approved Document Part M4(2)(2). These units would be better suited to ground floor maisonettes or bungalows in order to provide maximum accessibility. In addition, on sites of 50 or more units, we expect 10% of the affordable rented units to be built to the wheelchair user housing standard Approved Document Part M4 (3)(2)(b). We have an increasing number of applicants on the housing register requiring larger 3-bedroom 5/6 person bungalows and so would want to see at least 2 bungalows of this size and type on this development. We also have several households on our register needing a property with a level access shower adaptation and this can be met within the rented affordable housing mix.

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In terms of tenure split, whilst affordable home ownership is needed across Cherwell, and the Government has recently introduced Planning Policy Guidance to support delivery of First Homes within the affordable housing mix, what is not clear in this planning application is how affordable the proposed 50% 'affordable home ownership' products will be. In September 2020, the median house price in the Cherwell area (i.e. £300,000) was 9.3 times the median workplace-based income of £32,259. Shared ownership has been an affordable product for those households seeking to get on the property ladder with lower capital deposits and smaller mortgage levels. Homes England has recently introduced a new funding programme that supports the purchase of 10% equity shares in the properties funded through the AH Programme. Since 2015, Cherwell District Council has enabled 34% of new-build affordable housing to be shared ownership tenure. In the same period, just 2% of new affordable housing completed in the district was provided as Social Rent.

Given the available data on housing need the following suggested tenure and property mix would be policy compliant and would meet housing needs:

| <b>Property Type</b>                      | <b>70% Social Rent</b> | <b>30% Intermediate Housing (which could include First Homes, Shared Ownership or other affordable home ownership product)</b> |
|---|------------------------|--|
| <b>1 bed (2-person) maisonette or FOG</b> | 29%                    | 0%   |
| <b>1 Bed (2-person) Bungalows</b>         | 3%                     |  |
| <b>2 bed (4-person) house</b>             | 40%                    | 55%  |
| <b>2 bed (3 or 4-person) Bungalow</b>     | 5%                     | 1%   |
| <b>3 bed (5-person) House</b>             | 18%                    | 40%  |
| <b>3 bed (5 or 6 person) Bungalow</b>     | 2%                     | 0%   |
| <b>4 bed (7 person) House</b>             | 2%                     | 4%   |
| <b>5 bed (8 or 9 person) House</b>        | 1%                     | 0%   |
| <b>Total</b>                              | <b>100%</b>            | <b>100%</b>  |

In order to be policy compliant, the affordable homes would need to meet Policy Bicester 1 in all other aspects and should be fully integrated with the market housing and be distributed evenly across the site, in clusters of no more than 15 dwellings, of which no more than 10 of the dwellings are rented. However, it is possible to consider different clustering arrangements if this facilitates a reduction in management and service charges – making the cost of service charges and social rent on homes more affordable for occupiers.

If a viability test indicates that social rent is not viable on the scheme, then we would expect that Affordable Rent (which includes service charges) would be capped at Local Housing Allowance to support affordability. This is in line with our adopted Tenancy Strategy 2017 and further supported by the new draft strategy that is currently subject to consultation.

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We would normally expect that 1-bedroom dwellings will have a minimum of 1 parking space per unit, and all 2, 3- and 4-bedroom dwellings should have a minimum of 2 parking spaces per unit, however it is recognised that one of the key principles of this development is to encourage sustainable travel choices and we will comply with the car parking standards that are set by the Planning Officer. However, car parking spaces for units compliant with Part M4(2) or (3) should meet the requirements of the relevant Part of the document.

On completion, we would expect the affordable homes to be transferred to a Registered Provider and the Strategy and Development Team can provide a list of contacts if needed.