



HUNTINGDONSHIRE DISTRICT COUNCIL

Affordable Housing Advice Note

November 2024

Introduction

This note provides a summary of HDC`s main requirements for new affordable housing provision on development sites in the District, the purpose of which is to bring clarity and consistency for affordable housing within the area. This advisory note needs to be read in conjunction with:

- The adopted Local Plan (2019 - 2036) and relevant Neighbourhood Plans (and emerging new Local Plan)
- Huntingdonshire District Council's Housing Strategy 2021- 2025 (and emerging strategy 2025-2030)
- National Planning Policy
- National Described Design Standards (NDSS)

General Provision

The Council expects developers and builders to take account of its policies, particularly those relating to the need for affordable housing, when acquiring land for housing development. The most relevant planning policies are LP24, LP25 and LP28 in the Council's Local Plan.

What is affordable housing?

The National Planning Framework includes definitions of Affordable Housing. The Council sets out our definition as below:

“Affordable Housing can be Social Rented, Affordable Rented and or Intermediate tenures, (generally shared ownership), provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should where permissible, include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision”.

Affordable housing provision may include specialist or supported housing where an identified need exists. This may be in the form of m4(3) properties and bungalows to address physical disability or older persons needs and may also be accommodation to suit the needs of specialist groups.

In considering whether a development meets the threshold of 11 homes or 1,001m2 residential floorspace or more for providing affordable housing, the Council will consider the net increase in dwellings, which takes into account any loss through demolition or conversion.

In terms of rented Affordable Housing, the Council's practice is currently to allow either Affordable or Social Rented provision and S106s are drafted accordingly. This is finalised on a site by site basis during the course of discussions with a specific housebuilder, Developer or Registered Provider. For both of these tenures the rent must not exceed the Local Housing Allowance (LHA).

However, a new National Planning Policy Framework (NPPF) is currently under consultation (September 2024) and suggests Local Authorities should form a view on the proportions of these two tenures. The Council will therefore consider whether its position may need to be reviewed once the new NPPF is finalised.

Level of Need for Affordable Housing

The level of need for affordable housing is consistently high, the latest evidence from the G L Hearn report on The Housing Needs of Specific Groups confirms the priority need is for rented affordable housing.

We will seek affordable housing provision consistent with our Housing Strategy and Affordable Housing Provision as stated in the current Local Plan (LP 24).

A housing development will be required to provide a range of affordable housing types, sizes and tenures. The affordable housing provision may include specialist or supported housing where an identified need exists.

As LP24 states, a proposal will be supported where:

- a.** it delivers a target of 40% affordable housing on a site where 11 homes or 1,001m² residential floorspace (gross internal area) or more are proposed;
- b.** it provides approximately 70% of the new affordable housing units as Social or Affordable Rented properties with the balance made up of other affordable tenures (most of the other affordable tenures will be low cost home ownership in the form of Shared Ownership);
- c.** affordable housing is dispersed across the development in small clusters of dwellings; and
- d.** it ensures that the appearance of affordable housing units is externally indistinguishable from that of open market housing.

Design

As stated above **(d)** of LP24 states, the Council aspires to consistency of design and quality of housing across affordable and market housing. It does not follow that distinctly differing approaches in design of affordable housing compared to market homes is acceptable.

The design of affordable housing will as far as possible be consistent in approach to market housing and enable affordable housing occupants to enjoy the same quality of environment as market housing occupants.

In order to achieve tenure blind layout, the development will avoid unnecessary parking courts, poor relationship of parking to home, lack of on plot parking and significantly higher density than market housing.

As per the Council's Developers Contribution SPD, affordable housing will be distributed throughout a site in clusters. Unless otherwise agreed in writing by the Council, not more than fifteen (15) Affordable Housing Units shall be located in any one cluster and no cluster of Affordable Housing Units shall be immediately adjacent to or in close proximity to any other cluster

Additionally, party walls of differing tenures should be avoided as occupants of differing tenures may receive different management arrangements.

For flats/apartments/maisonettes it is desirable to avoid communal areas which will result in service charges. Two storey blocks should ideally have an external door. In any event no more than three storeys blocks are acceptable as this would prevent the need for lifts.

All new homes are to meet Building Regulation M4(2). In addition, as per LP25, for a large scale development (50 or more units, or 2 hectares, or 2,500m² as per Local Plan) a proportion of market homes should be to m4(3) and regardless of development size a proportion of m4(3) affordable housing should be provided.

Precise levels of need will vary in response to circumstances, where proposals state that meeting such requirements would be impractical or unviable, (such as may be the case where floor levels need to be raised due to flood risk and this would necessitate significant ramping to comply with the standards), developers of affordable housing should provide evidence supporting this conclusion.

Further detail on need is expanded further at para 7.22 of LP25, which suggests that to meet need, 9% of market homes and 30% of affordable housing should be m4(3) and in the Huntingdonshire Accessible and Specialist Housing Evidence Paper.

Type of property

The Council will at the appropriate time (site by site), specify the type, number and tenure required. In preparing this the Council is mindful of need and takes into account (if necessary) specific site issues. LP24 is once again relevant, it states (in addition to the matters already mentioned):

“In order to assist in meeting the identified local need for additional affordable homes, a proposal which includes housing development will be required to provide a range of affordable housing types, sizes and tenures. These should be appropriate to meet the requirements of the local community taking into account the latest evidence from the Housing Register, the Cambridgeshire sub-region Strategic Housing Market Assessment and other local sources. The affordable housing may include specialist or supported housing where an identified need exists”

The following mix of homes size by tenure is suggested as a strategic mix for Huntingdonshire for the 2020-2040 period in the Housing Needs of Specific Groups in October 2021.

Size	Market	Affordable Homes to Buy	Affordable Homes to Rent
1 bedroom	0-10%	15-25%	30-40%
2 bedroom	20-30%	35-45%	35-45%
3 bedroom	40-50%	25-35%	15-25%
4 bedroom	20-30%	5-15%	0-1

In accordance with LP24 the Council refers to other evidence, which is equally important, most notably the more up to date Housing Register data. As an overview:

- Accommodation for families should be properties with two or more bedrooms.
- The mix of types of property (house, flat, bungalow)
- The number of homes which should be m4(3).
- For flats regardless of whether they are m4(3), if they are on the ground floor bathrooms should be provided with level access shower or wet room, this also applies to any bungalows.

Size of units Property size

The Council's Local Plan is currently under review, the current plan does not require homes to meet the Nationally Described Space Standards (NDSS) although the emerging plan is intended to require all affordable housing to be to Nationally Described Space Standards (NDSS). Nonetheless our Local Plan does make reference to NDSS, it states:

(LP25 para 7.18) The current Local Plan does not include a policy requirement for new housing to meet the Nationally Described Space Standard. However, developers may wish to refer to the Technical housing standards – nationally described space standards to evidence how their proposals meet the broader policy requirement of providing housing of sizes which help achieve sustainable, inclusive and mixed communities. In relation to this particularly for affordable housing for rent and in contrast to much market housing, it should be recognised that such homes are likely to be fully occupied

NDSS is therefore encouraged and in considering housebuilder/developer proposals a 'fit for purpose' approach will be taken. As confirmed affordable housing will be fully occupied so standards should be such that this is indeed recognised.

Occupation levels will also be considered, for example, 2 bedroom houses should be 4 person and not 3 person as is sometimes proposed.

For shared ownership the need is mostly for 2 and 3 bedroom houses. As the housing is for sale, a 'spare' room can be considered hence for example a household with a minimum requirement of one bedroom can be considered for a 2 bedroom home.

NOTE As per policy, all homes are to be m4(2). All the bungalows including m4(2) to be wheelchair accessible with level access shower/wet room or to full wheelchair standard m4(3) where indicated; full wheelchair m4(3) to have hoist capacity (to be fitted for first or subsequent tenant) allowing easy transfer from main bedroom to bathroom. Convenient level access route from car to home in a wheelchair to be confirmed on plans provided within the planning application Our Special Housing Needs Officer may from time to time ask for some of the rented homes to be adapted to meet the needs of applicant families. She will liaise with the RP and yourselves to confirm necessary details. Please note also number of persons to be housed by property type and tenure.

Number of bedrooms	Gross Internal Floorspace
1 bedroom flat	50 sq. m
2 bedroom 4 person 2 storey house	79 sq. m
3 bedroom 5 person 2 storey house	93 sq. m
4 bedroom 6 person 3 storey house	112 sq. m

Unit size Accommodation should meet the following

Number of bedrooms	Minimum number of people
1 bedroom flat	2 person
1 bedroom bungalow	2 person
2 bedroom flat	4 person
2 bedroom bungalow	At least 50% 4 person
2 bedroom house	4 person
3 bedroom	5 person
4 bedroom	6 person

Nb – 2 bedroom bungalow 50% to be 3 person 50% to be 4 person

Adaptable and Accessible

In reflection of the ageing population within the District 20% of one bed units to be built to HAPPI design principles – with particular attention given to:

- layouts maximise natural light and ventilation by avoiding internal corridors and single-aspect flats,
- all apartments have balconies, patios, or terraces with enough space for table and chairs as well as plants;

- Adequate storage is available inside & outside the home together with provision for cycles and mobility aids, storage inside the home meets the needs of the occupier;
- In the implementation of measures to ensure adaptability, homes are designed to be 'care ready' so that new and emerging technologies, such as telecare and community equipment, can be readily instal

All new homes are to meet Building Regulation M4(2) in addition around 30% of homes are to meet Building Regulation M4(3) overall, but precise levels of need will vary in response to circumstances:

30% of homes are to meet Building Regulation M4(3). **LP25 M4(3) Category 3** – 'Wheelchair User Dwellings', split into two sub-types:

- Category 3 (a) – 'Wheelchair adaptable' (providing space and layout features, but not fully fitted out), and
- Category 3 (b) – 'Wheelchair accessible' (ready and fitted to accommodate wheelchair user household)

The majority of M4(3) will be M4(3a) unless specified.

New build warranty and adaptations to M4(2) properties

In order to meet the needs of a specific household, adaptations may be required to an affordable home.

The housebuilder/developer and Registered Provider should enable the provision of such adaptations at any time, either at first or subsequent let unless the works significantly impacts on the structure of the property. Any building work would be carried out carefully by competent contractors who are fully insured.

It should be possible for Building Defects warranties not to be adversely affected and as a result identified adaptations required to make property accessible to M4(3a) to M4(3b), will be incorporated.

Alternative Tenures

As the evidence base (Housing Needs of Specific Groups) shows by some margin, the most pressing need is for Affordable Rented and Social Rented housing. For this reason, policy specifies that 70% of new affordable housing should be to these tenures.

In terms of low cost home ownership (addressing the needs of those aspiring to own their own home but unable to afford housing at market levels) the Council considers the best option is Shared Ownership. This addresses the needs of a variety of

income groups; differing proportions of initial ownership can be acquired dependant on an applicant's circumstances. As those circumstances improve additional tranches can be acquired and ultimately staircasing to full ownership can be achieved. It follows that the remaining 30% is mostly expected to be Shared Ownership.

Whilst Shared Ownership is the Council's preferred route to Affordable Home Ownership. The Council may also accept other affordable housing tenures where these are justified by particular local needs or circumstances and consistent with national policy.

The needs of specific groups such as Key Workers may also from time to time be considered, and this may include considering which tenures best suit the groups under consideration.

Services charges

Service charges should be kept reasonable and within Local Housing Allowance (LHA). The total costs of rent and service charges for all affordable units should not exceed LHA levels at each letting. Early consultation is recommended with the Strategy and Enabling team to minimise high service charge costs

HDC Local Housing Allowance rate April 24 – 31 March 25

	Huntingdon Area	Cambridge Area	Peterborough Area	Northampton Central Area
Shared Accommodation Weekly Rate	£105.86 (£458.72)	£121.13 (£524.90)	£79.36 (£343.89)	£86.50 (£374.83)
1 Bedroom Weekly Rate	£149.59 (£648.22)	£207.12 (£897.52)	£132.33 (£573.43)	£126.58 (£548.51)
2 Bedroom Weekly Rate	£182.96 (£792.83)	£218.63 (£947.40)	£161.10 (£698.10)	£159.95 (£693.12)
3 Bedroom Weekly Rate	£218.63 (£947.40)	£258.90 (£1121.90)	£186.41 (£807.78)	£182.96 (£792.83)
4 Bedroom Weekly Rate	£287.67 (£1246.57)	£333.70 (£1446.03)	£241.64 (£1047.11)	£228.99 (£992.29)

Developer/housebuilder/landowner form of Affordable Housing provision

Affordable Housing is expected to be provided on site without any public subsidy, this would be in line with Homes England policy and the same would apply to any commuted sums the Council holds. The Council secures this through a Section 106 Planning Obligation usually in the standard form.

Registered Providers will submit offers based on the tenure and types of Affordable Housing specified in the planning application (without public subsidy). The S106 will specify:

- Relevant definitions for Affordable Housing.
- Details of an Affordable Housing Scheme requiring formal submission and approval by the Council before commencement of development. The Scheme confirms the details of the Affordable Housing to be provided (mix, types, tenure etc.), the identity of the Registered Provider and that terms are agreed to deliver the Scheme, the nomination levels to accrue to the Council and the manner in which Shared Ownership is to be addressed.
- Timescales in which the Affordable Housing must be delivered relative to market homes (for example not to occupy more than 'x' % of the market homes until 'y'% of the affordable homes have been transferred to the Registered Provider and are ready for occupation).
- Mortgagee in Possessions clauses which are essential to all the Registered Providers to enable them to secure the necessary finance.

Approach to Public Subsidy

Public Subsidy in the form of grant from Homes England or Commuted Sums secured by the Council in lieu of onsite affordable housing provision is not eligible for delivering policy level affordable housing (the usual 40%).

If Public Subsidy is available the Council will work with Registered Providers, Homes England and other interested parties to secure 'additionality' to deliver affordable housing in excess of policy level. The Council has in partnership with Registered Providers, delivered a number of developments in this way including developments delivering 100% affordable housing.

The Council will in appropriate circumstances, continue in principle to support such initiatives which secure additional affordable housing.

In those discussions the Council is mindful to still address identified need but also to ensure sustainable development is delivered. The Council will use Local Lettings Plans for the rented homes which allow the Council and Registered Providers to allocate accommodation such that they deliver a balanced community, these developments will often involve a significant proportion of Shared Ownership.

Viability

The council generally delivers policy level affordable housing on site, on rare occasions there may be reasons why this is not viable. In these circumstances the Council requires formal submission of a Viability Assessment. This needs to be such that it provides a detailed financial assessment of the development costs. The Council will appoint consultants to scrutinise the assessment and form a view as to whether there is a Viability barrier.

The Council will ask its consultants to consider a number of options to consider whether different forms of affordable housing is viable. This may involve considering a lower level of affordable housing or different proportions of tenures (if a quantum of 40% with 70% rented housing and 30% shared ownership is considered unviable). It will also consider if there is scope to secure a financial contribution in lieu of onsite provision (see below Commuted Sums).

The cost of employing a consultant must be borne by the applicant and payable in advance in order for the Council to instruct the consultants.

Commuted Sums

Commuted Sums, payments to the Council in lieu of on-site affordable housing provision, are secured via S106 Planning Obligations. This will confirm that the Council will use these funds to assist delivery of affordable housing at another location in the District. This is generally calculated based on residual land value.

Rural Exceptions Housing.

Local Plan Policy LP28 confirms that:

“A proposal for housing will be supported on a site well-related to a built-up area, as an exception to the requirements of relevant policies, where it can be demonstrated that:

a. at least 60% (net) of the site area is for affordable housing for people with a local connection;

b. the number, size, type and tenure of the affordable homes is justified by evidence that they would meet an identified need arising within the settlement or nearby small settlements (as defined in 'Small Settlements') through a local needs survey or other local needs evidence;

c. the remainder of the site area is available as open market housing or plots suitable for custom or self-build homes tailored to meet locally generated need; and
d. the amount of development and location of the proposal is sustainable in terms of:

i. availability of services and existing infrastructure; ii. opportunities for users of the proposed development to travel by sustainable modes;

and

ii. effect on the character of the immediate locality and the settlement as a whole.

Mechanisms, including planning conditions/ obligations, will be put in place to ensure that the affordable housing is delivered and remains affordable in perpetuity or for the appropriate period as applicable to the form of housing. To ensure that market housing and affordable housing elements are delivered concurrently a planning condition will be applied.”

The policy is intended to primarily provide rural housing for people with a connection to the village under consideration. The connection can be:

- by living in the village,
- having previously lived in the village,
- having close relatives in the village, or,
- having an employment connection.

It is essential that formal evidence of need is provided, and this should be by way of a local Housing Needs Survey. To ensure independence, the Survey is carried out by Cambridgeshire ACRE, this survey is usually funded by the Registered Provider or Landowner. The Council works with CACRE, Parish Councils, Registered Providers and other interested parties.

More detailed criteria is set out in LP28 but if they are met and need is established, the affordable housing should occupy not less than 60% of the proposed net site area and the remainder can comprise of market housing.

Links to documents referred to in this paper:

[Huntingdonshire's Local Plan to 2036](#)

[Developer Contributions Supplementary Planning Document](#)

[Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK](#)

[CWS Table](#)

[Technical housing standards – nationally described space standard - GOV.UK](#)

[Housing our Ageing Population Plan for Implementation.pdf](#)

<http://www.huntingdonshire.gov.uk/media/2687/huntingdonshire-accessible-and-specialist-housing-evidence-paper.pdf>