

APPENDIX 2

RECOMMENDATIONS ON REPRESENTATIONS IN DOCUMENT ORDER DEVELOPER CONTRIBUTIONS TOWARDS AFFORDABLE HOUSING

Consulting : 15-06-2007 - 27-07-2007

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr	186 Mr Ian Baker (Covington Parish Meeting)	4223 Observations	The document does not address the issue of affordable housing in the village or rural setting particularly for single/young people.	The document does not address the issue of affordable housing in the village or rural setting. The retention of single and young adults in the community is needed. Renting property is as difficult for young people setting out on careers as purchasing property. Village properties are often beyond their financial reach or too large in accommodation to suit their needs.	The document does address affordable housing in village and rural settings. The requirement for affordable housing in settlements of 3,000 population applies to all sites.
Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr	323 Mr Stephen Dartford (Fenstanton Parish Council)	4224 Observations	How will developments of 2 dwellings 'produce' the affordable house?	Fenstanton with its population of approximately 2500, under the 3000 mark, has over the recent years had large developments of 100 plus dwellings which carried the 40% target	In villages as small as this, it is expected that there will be an affordable housing component on all developments where the % requirement results in more than one dwelling – i.e. at least 3 dwellings will be needed in the development.

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				<p>for affordable housing. The village has also had smaller developments of 2 or more dwellings, i.e. The Bumbles, Grove House, Lyndhurst and 14-16 Bell Lane, falling into this category. Will developments of this size also be subject to a 40% target?</p> <p>If this is the case how will developments of 2 dwellings 'produce' the affordable house?</p> <p>Where will it be built?</p> <p>How will the system work?</p> <p>Will the selling price of the new dwellings be a factor in the equation?</p>	<p>The system will work in the same way as the larger developments in settlements with a population of over 3,000.</p>
<p>Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr</p>	<p>323 Mr Stephen Dartford (Fenstanton Parish Council)</p>	<p>4227 Observations</p>	<p>As and when affordable homes become available in the village, priority should be given to local people enabling them to remain within their community. Should people wish to move from outside</p>	<p>If 'affordable' housing is the current label for 'social housing' or 'association housing' this Parish Council feels that, as and when these homes become available in the village, priority should be given to local people enabling them to</p>	<p>The council's housing register identifies people in priority need and housing is allocated on this basis, but this is not a matter for this planning document.</p>

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			the area the 'swop' system should be applied.	remain within their community. Should people wish to move from outside the area the 'swop' system should be applied.	
Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr	<p>399 Ms Karen Cameron (Huntingdon Town Council)</p> <p>398 <i>Ms Karen Cameron (Huntingdon Town Council)</i></p>	4369 Object	Opposed to the principle of mixed housing and should avoid trying to recreate the social engineering exercises of the 1970's, which clearly failed. Schemes such as Equity Share could make purchasing viable while at the same time releasing rental homes for those who are living on benefit or with income levels too low to consider purchase.	<p>The Council is opposed to the principle of mixed housing and believes we should avoid trying to recreate the social engineering exercises of the 1970's, which clearly failed. Putting homes such as those, for example, in The Whaddons alongside those in, for example, The Grove is simple not going to work for either social group.</p> <p>The Council believes that the statement in 5.3 may be true, in that there is a need for 585 units of social housing per year, but some of this could be met by building more units of affordable housing for purchase by lower income families, who rent because buying is beyond their reach.</p>	As discussed in 6 of the draft document (The Council's Housing Strategy), some intermediate housing such as equity share is envisaged, but socially rented housing is required to meet the high levels of housing need. Policy SAH/5 sets a priority order of 70% social rented housing and 30% intermediate housing.

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				Schemes such as Equity Share could make purchasing viable for this group, while at the same time releasing rental homes for those who are living on benefit or with income levels too low to consider purchase.	
Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr	42 Mr Paul Cronk (HBF)	4377 Other	<p>A Strategic Housing Market Assessment is required in accordance with national policy.</p> <p>The precise percentage of affordable housing in a development should be a matter for negotiation.</p> <p>Policy should be set out in a Development Plan Document, not an SPD.</p>	<p>General: National policy</p> <p>The Council will now need to take on board the full implications and relevant content of PPS3 and Delivering Affordable Housing (Nov 2006).</p> <p>A Strategic Housing Market Assessment must be undertaken to look at the need for all forms of housing (not just social rented) and be carried out in the appropriate manner in full consultation with local landowners, developers and other interested parties before any policy approach can be considered robust.</p>	<p>The Council commissioned a Housing Needs Study in 2002, and this was updated in 2006. This provided sufficient information to inform the policies of SPD. A Strategic Housing Market Assessment is currently in preparation and will be taken into account when the policies on affordable housing are considered again in the development of the Core Strategy, following which it is intended that the SPD will be revised.</p> <p>It is accepted that the precise requirement for affordable housing will be a matter for negotiation in respect of a Section 106 agreement. The SPD provides policy guidance for the Council in making development control</p>

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				<p>Annex c of PPS3 states that "Strategic Housing Market Assessments and Strategic Land Availability Assessments are an important part of the policy process. They provide information on the level of need and demand for housing and the opportunities that exist to meet it. Assessments should be prepared collaboratively with stakeholders. Where two or more Local Authorities form a housing market area, Local Planning Authorities should work together either by preparing joint assessments or by ensuring consistency in methodology. Practice guidance will set out detailed methodologies for carrying out these assessments.</p> <p>A Strategic Housing Market Assessment should:</p>	<p>decisions.</p> <p>To clarify the requirements and the situation regarding the relationship of this SPD with saved policies it is proposed to amend Policy SAH/1 and the supporting text in paragraphs 7.2 to 7.7 as follows:</p> <p>'Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3,000 or more population (or 0.5ha irrespective of the number of dwellings) and on all sites in settlements of 3,000 population or less. In the remainder of the District the Council will seek 29% Affordable Housing using the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken into account.'</p> <p>7.2 The Huntingdonshire Local Plan</p>

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				<ul style="list-style-type: none"> • Estimate housing need and demand in terms of affordable and market housing. • Determine how the distribution of need and demand varies across the plan area, for example, as between the urban and rural areas. • Consider future demographic trends and identify the accommodation requirements of specific groups such as, homeless households, Black and Minority Ethnic groups, first time buyers, disabled people, older people, Gypsies and Travellers and occupational groups such as key workers, students and operational defence personnel.” <p>Any affordable housing requirement must seek to take on board the overall viability of schemes (including the</p>	<p>Alteration 2002 is part of the statutory Development Plan for the District and its saved policies will apply until replaced by those in the Core Strategy of the Local Development Framework. For the part of the District outside of the Cambridge Sub Region as shown on the Map in Appendix 2, the Local Plan Alteration Policy AH4 target of 29% is the unchanged requirement.</p> <p>7.3 For that part of the District within the Cambridge Sub-Region, the requirement for Affordable Housing to be provided on eligible sites is 40% or more. This accords with the former Policy P9/1 of the Cambridgeshire Structure Plan which was based on evidence of housing needs. This SPD was initially drafted and consulted on following the County Council issuing a Statement of General Conformity (January 2006) which said that the Local Plan Alteration was not in conformity on this</p>

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				<p>likely availability or not of grant funding) and will need to consider the full range of other planning gain requirements likely to be sought. Unrealistically high affordable housing requirements and very low site size thresholds could severely threaten overall housing delivery rates.</p> <p>The precise mix of affordable dwellings in any housing development should be a matter for negotiation between developers and the Council taking on board the latest information from the evidence base, the availability or not of grant funding, current market conditions, and the nature and characteristics of each site. It is not for the Council to seek to dictate a precise mix for all housing developments.</p>	<p>matter.</p> <p>7.4 The need for a higher target than 29% is also shown in Policy H3 of the draft East of England Plan (RSS). The draft RSS is at an advanced stage of preparation with proposed changes having been published in December 2006 and further proposed changes in October 2007 with adoption expected early in 2008. Once adopted it will be part of the development plan. Policy H3 requires that delivery of affordable housing should be monitored against the expectation that some 35% of all housing coming forward over the entire region as a result of planning permissions granted after the adoption of the RSS are affordable. As Huntingdonshire, especially the part in the Cambridge sub-region, experiences more problems with affordability than many other parts of the region the target needs to be higher than 35% in order to meet above</p>

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				<p>The Federation does not consider it appropriate to delegate matters such as the amount, type and size of affordable housing to a SPD. Any matters of importance to development costs will instead need to be clearly set out in a Development Plan Document (DPD), rather than being delegated down to a SPD. Given that they could potentially have a significant impact on development viability, they must instead be dealt with in DPDs and subjected to the appropriate public scrutiny bestowed upon these.</p> <p>The government published 'Delivering Affordable Housing' in Nov 2006. This document makes a number of important points:</p> <ul style="list-style-type: none"> • The new definition includes new models of 	<p>average needs. Additionally, Affordable Housing contributions are only sought on eligible sites; therefore in order to achieve 35% of all housing coming forward as Affordable Housing it will require a percentage above 35% on eligible sites to meet the target.</p> <p>7.5 The local evidence base, including the latest housing needs surveys, demonstrates a high level of need across Huntingdonshire as explained in part 5 of this SPD. A requirement for 40% affordable housing is also consistent with Policy H7 of the Interim Planning Policy Statement and the Preferred Options for the Core Strategy which is being released at the same time as this SPD is adopted. The Strategic Housing Market Assessment is also expected to be completed in 2007 showing a high need for affordable housing. Consideration has been given to seeking 40% affordable housing across</p>

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				<p>affordable housing, and it is not essential that all affordable homes are offered under identical conditions;</p> <ul style="list-style-type: none"> • There are now far more areas where local authorities need, through the planning system , to be thinking about provision of intermediate market housing; • There is increasing acceptance of the need for more housing of all tenures to be provided in many areas; • There has been much innovation from both the financial community and developers with regard to affordable housing provision; • There needs to be realistic affordable housing targets and thresholds given site viability, funding 'cascade ' agreements in case grant is not provided; 	<p>the whole of the district, but at this stage the requirement for 29% over the part outside of the Cambridge sub-region is being maintained on the basis of the policies that existed at the time that the SPD was drafted and consulted on. The matter will be reconsidered, and the SPD revised, following the completion of the Core Strategy and Strategic Housing Market Assessment.</p> <p>7.6 All requirements are subject to the negotiation of agreements under s106 of the Town and Country Planning Act 1990. Other contributions towards infrastructure and restrictions on development may also be negotiated. In negotiating agreements, the commercial viability of the development will be taken into account. Government guidance in Circular 05/05 states that decisions on the level of contributions should be based on negotiation with developers over the level of</p>

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				<ul style="list-style-type: none"> <li data-bbox="1292 320 1576 555">• It is important that affordable housing provision should not be seen as the only possible solution for those who cannot afford to buy a home in the market; and <li data-bbox="1292 592 1547 826">• Affordable housing is normally only viable when a subsidy is provided, usually the Housing Corporation National Affordable Housing Programme (NAHP). 	<p data-bbox="1594 292 1908 435">contribution that can be demonstrated as reasonable to be made whilst still allowing development to take place.</p> <p data-bbox="1594 472 1908 1332">7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha irrespective of the number of dwellings) in settlements larger than 3,000 population and to all sites regardless of size in settlements of 3,000 population or less. This policy applies equally to general needs housing developments and to specialist developments like retirement housing schemes. However, PPS3 in paragraph 29, states that the indicative minimum threshold is 15 dwellings and the indicative minimum density is 30 dwellings per hectare. The current threshold of 25 dwellings in settlements of over 3,000 population as set out in the LPA has now therefore been reduced to 15 as it has been superseded by more recent Government guidance. As</p>

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					15 dwellings equates to 0.5 ha at a density of 30 dwellings per hectare, the site size has also been reduced to 0.5 ha to reflect the current national indicative minimum density in paragraph 47 of PPS3.'
Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr	42 Mr Paul Cronk (HBF)	4378 Other	The SPD should clearly identify how it relates to, and is consistent with, the existing development plan.	The whole purpose of Supplementary Planning Documents is to amplify and expand upon the content of saved policies in an Adopted Local Plan or Development Plan Document. Therefore, its content has to fully accord with the specific policies in the adopted statutory Plan to which it relates. The document has to clearly show in full the individual adopted policies to which its content relates. This needs to be done in	The SPD clearly identifies the policies that it relates to in the existing development plan, and the way in which it is consistent with them. The SPD relates to Policy AH4 of the Local Plan Alteration 2002 as well as updated evidence of housing needs. Initially the SPD was also drafted on the basis of Policy 9/1 in the Structure Plan but this was not saved on 27 September 2007. Amendments have been made to the supporting text

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				<p>order for local authorities to adopt the document as a SPD if it has been listed in their adopted LDS.</p> <p>Planning Policy Statement 12 (PPS12) indicates that a SPD must be consistent with policies in the development plan documents or 'saved' Local Plan (para 2.43) and that whilst SPDs may contain policies which expand or supplement those policies, that SPDs should not include policies that should be subjected to proper independent scrutiny in accordance with statutory procedures (par 2.44).</p> <p>Whilst SPDs are not subject to independent examination, paragraph 4.39 in PPS12 Local Development Frameworks states that the underlying principles of soundness remain</p>	<p>to explain the basis for the SPD.</p> <p>The content of the SPD is appropriate, having considered relevant alternatives, and is founded upon a robust and credible evidence base.</p>

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				applicable which includes that the content of the SPD should be appropriate, having considered relevant alternatives, and be founded upon a robust and credible evidence base.	
Developer Contributions Towards Affordable Housing Supplementary Planning Document - Consultation Dr	30 Mr Martin Page (D H Barford + Co.)	4408 Object	Increasing the level of affordable housing and lowering the threshold are not justified, will lead to an increase in housing costs and exacerbate the housing shortage. The SPD is not considered to be sound or 'fit for purpose'.	Having regard to the need to meet all sectors of housing need, including private market housing, the proposal to increase the level of affordable housing provision and lower the threshold is not justified when the perceived level of need has reduced substantially since the 2002 Housing Need Survey. The proposed strategy will only compound the Council's lack of delivery of private market units. This will in turn fuel an increase in housing costs and exacerbate the district's housing. For the above reasons the Council's Consultation SPD	The need for affordable housing has not reduced since 2002. The changes between the 2002 survey and the 2006 update are primarily due to changes in the methodology and the overall level of need remains very high. The thresholds have been set out in the development plan i.e. all sites in villages of less than 3,000 and in PPS3 i.e. in developments of over 15 houses. The proposal to increase the level of affordable housing provision applies only to the Cambridge sub-region.

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				document is not considered to be sound or meet the 'fit for purpose' approach.	

1 Purpose of this document

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1.2 For Huntingdonshire District the relevant Development Plans are:	<p>731 Persimmon Homes East Midlands (Persimmon Homes East Midlands)</p> <p>730 <i>Miss Sinead Morrissey (Pegasus Planning Group)</i></p>	3817 Object	Consideration and reference should be made to the RSS including SoS changes.	The Affordable Housing Document has failed to consider the emerging RSS14: The East of England Plan. Despite the delay in the process of the RSS, the policies within the Plan and the SOS proposed changes should be considered and listed with the remainder of the documents in Paragraph 1.2 as the EEP is part of the emerging Development Framework for the area as stated in Paragraph 1.5.	<p>Reference to the Regional Spatial Strategy and the Secretary of State's changes is made in Appendix 1 of the consultation draft. The consultation draft is consistent with the changes to the RSS which envisage that there will be an average of 35% affordable housing coming forward across the region. The reference to the RSS in paragraph 1.5 is considered appropriate as it is not currently part of the Development Plan listed in paragraph 1.2.</p> <p>It is proposed to amend a paragraph of the SPD to also refer to the draft RSS as follows:</p> <p>7.4 The need for a higher target than 29% is also shown in Policy H3 of the draft East of England Plan (RSS). The draft</p>

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					<p>RSS is at an advanced stage of preparation with proposed changes having been published in December 2006 and adoption expected in 2007. Once adopted it will be part of the development plan. Policy H3 requires that delivery of affordable housing should be monitored against the expectation that some 35% of all housing coming forward over the entire region as a result of planning permissions granted after the adoption of the RSS are affordable. As Huntingdonshire, especially the part in the Cambridge sub-region, experiences more problems with affordability than many other parts of the region the target needs to be higher than 35% in order to meet above average needs. Additionally, Affordable Housing contributions are only sought on eligible sites; therefore in order to achieve 35% of all housing coming forward as Affordable Housing it will require a percentage above 35% on eligible sites to meet the target.</p>

2 Corporate Approach

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
2.2 In this document:	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3602 Support	Support		The support is noted.
2.2 In this document:	404 Director Andy Chapman (Luminus)	3755 Support with conditions	the word "land " should be replaced by "land or dwellings" as often the provision will be of flats rather than land. In addition this could allow for the provision of free completed units	I would like to see the word "land" replaced by "land or dwellings" as often the provision will be of flats rather than land. In addition this could allow for the provision of free completed units	The sentence in 2.2 is copied from the corporate plan and therefore cannot be amended. Regardless, the sentence would not make sense with the addition as requested. The relevant part says: 'enabling the provision of affordable housing by maximising the land available for new affordable housing'.

3 Sustainability Appraisal

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
3 Sustainability Appraisal	42 Mr Paul Cronk (HBF)	4384 Object	The Sustainability Appraisal should further consider the possible economic impacts of the draft SPD, as the costs of providing land for affordable housing may act as a deterrent to bringing forward sites for development.	Whilst the Sustainability Appraisal carefully considers the possible environmental impacts of the Draft SPD, it does not properly consider the possible economic impacts. Clearly if landowners are expected to ensure the delivery of free-serviced land for the Council's preferred types and percentages of affordable housing provision (particularly in the absence of suitable grant funding), this may well	Part 7 of the Sustainability Appraisal relates to economic activity in relation to business and work. 6.3 of the Sustainability Appraisal considers the question of whether the SPD seeks to ensure that all groups have access to decent, appropriate and affordable housing. Having to provide affordable housing

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				act as a deterrent to them bringing forward their sites for development. Thus affecting the overall housing delivery rates, and adding to affordability problems.	does not usually deter development, and any particular difficulties can be considered at the planning application stage.

4 Policy Background

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
4.1 Planning policies at all levels, Government, Regional, County and District emphasise the importance	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3603 Support	Support		The support is noted.

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4.4 Regional, County and District level planning policies, both statutorily adopted and emerging, recogn	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3604 Support	Support		The support is noted.

5 The Housing Needs Survey

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
5.1 The Council commissioned Fordham Research to undertake a comprehensive Housing Needs Study in 2002.	<p>731 Persimmon Homes East Midlands (Persimmon Homes East Midlands)</p> <p>730 <i>Miss Sinead Morrissey (Pegasus Planning Group)</i></p>	3816 Object	The Housing Needs Survey (Update 2006) is out of date and therefore the data supplied in the SPD is unreliable and does not confirm the latest housing need. A new housing needs survey needs to be undertaken in order to confirm the latest housing needs figures.	<p>The Housing Needs Survey (Update 2006) is out of date and therefore the data supplied within the supplementary planning document is unreliable and does not confirm the latest housing need.</p> <p>A new housing needs survey needs to be undertaken in order to confirm the latest housing needs figures.</p>	The Housing Needs Survey is not out of date. The process of preparing the SPD is now nearing completion – the first consultation draft SPD was released in September 2006.
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5.3 The main findings of the 2006 survey are:	404 Director Andy Chapman (Luminus)	3756 Object	The provision of intermediate products can affect need. The assessment underestimates the number of key workers in need.	<p>I disagree with the comment that only new social housing can assist in meeting need.</p> <p>The provision of intermediate products (particularly with targeted incentives) can impact significantly on meeting the aspirations of existing social rented tenants and hence increase the turnover and availability of existing stock.</p> <p>There are many key workers that cannot afford market housing but many of these groups have not been</p>	As discussed in 6 of the draft SPD, some intermediate housing such as equity share is envisaged, but socially rented housing is required to meet the high levels of housing need. Policy SAH/5 sets a priority order of 70% social rented housing and 30% intermediate housing. The amount of need from key workers, which may fluctuate depending on access to funding, would not change these percentages.

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				surveyed. Our own marketing has shown demand for many more than 4 homes per year requirement for key workers	
5.3 The main findings of the 2006 survey are:	323 Mr Stephen Dartford (Fenstanton Parish Council)	4225 Observations	Private developers do not provide an affordable option to older house owners wishing to 'down size' as their families grow up.	Fenstanton consists of an increasing proportion of older house owners wishing to 'down size' as their families grow up and attempt to enter the housing market for themselves. Private developers do not provide an affordable option to deal with this albeit that these dwellings are being released back into the family home element of the housing mix.	The requirements for affordable housing, together with a range of planning policies, will help increase the supply of smaller houses.
5.3 The main findings of the 2006 survey are:	30 Mr Martin Page (D H Barford + Co.)	4358 Object	The Housing Needs Survey Update indicates a reduction in the need for affordable housing since 2002. Therefore, an increase in the affordable housing requirement is not justified.	Paragraph 2.2 of PPS12 states 'a comprehensive and credible evidence base should underpin the policies in the development plan documents'. To support the SPD the Council relies on the Housing Needs Survey Update 2006, which identifies the quantum of units required to meet the affordable housing need has reduced from 1,013 affordable dwellings per year to 585 dwellings per year since 2002 i.e. a reduction of 42.25%. The evidence base clearly does not substantiate that it is necessary to increase the affordable housing requirement on new developments. The text seeks to dismiss the	It is not true to say that the level of Affordable Housing Need has reduced between the two Needs Assessments of 2002 and 2006; the changes are primarily due to changes in the methodology and the overall level of need remains very high.

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				<p>reduction due to new methodology. The reason for the lower figure is that the update is based on more up to date data, such as the 2001 Census, and the refinement of the Basic Needs Assessment Model. For example, the 2002 survey included accommodation that was too large for a household as being unsuitable housing. The fact remains that the quantum of need the Council considers exists and has previously argued has reduced.</p> <p>A key component of the Basic Needs Assessment Model is an assumption in respect of the annual number of moves by households. The 2006 update uses the same assumption in the 2002 study of 22,691 moves in the past 3 years. However, data clearly points to a reduction in the annual number of moves within the district since 2002. Land Registry data identifies there was a 20% reduction in the number of houses bought and sold across the County between 2002 and 2005. The Housing Needs Survey Update also identifies that the number of annual re-lets of affordable houses within the district has reduced from 709 in 2002 to 483 in 2006, a 32% reduction. These factors have been</p>	

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				drawn to the Council's attention and its consultant, Fordham, have accepted the number of moves over the last 3 years could be closer to 20,168 (see Appendix A). This equates to an 11% reduction. The implication is that the annual affordable housing need will be closer to 474 dwellings than the 585 dwellings identified in the Housing Needs Study Update. This represents a 53% reduction on the 2002 Housing Needs Survey conclusion and a 19% reduction on the 2006 Housing Needs Survey Update conclusion.	

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5.4 The 2006 study concluded that the need for Affordable Housing represents considerably over 100% of t	404 Director Andy Chapman (Luminus)	3757 Object	Objects to the statement that any target for affordable housing would be justified given that the need is assessed as more than 100% of the new build target	If any target is justifiable then no land would come forward.	It is accepted that developers need to have profitable private housing alongside the provision of affordable housing. A target of 40% in the Cambridge sub-region is considered to be generally achievable.
5.4 The 2006 study concluded that the need	30 Mr Martin Page (D H	4385 Object	The statement that housing need represents over 100% of the estimated new build target (559 dwellings per year in the	Having regard to the point made above, the statement the housing need represents over 100% of the estimated new build target (559	The total assessed need is 1055 houses per year (585 socially rented houses and 470 intermediate houses), which is

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for Affordable Housing represents considerably over 100% of t	Barford + Co.)		RSS document) is incorrect	dwellings per year in the RSS document) is incorrect.	in excess of the 559 new build target (it is 188%).

6 The Council's Housing Strategy

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6.4 Evidence from the Council's Housing Register also confirms high levels of housing need in the district..	30 Mr Martin Page (D H Barford + Co.)	4386 Observations	It should be acknowledged there has been a reduction of households on the Council's housing register over recent years.	There is reference to 2,132 households on the Council's housing register at 31st March 2007. However, it should be acknowledged there has been a reduction over recent years: at the 1st April 2003 there were 2,868 households on the Council's housing register and at January 2006 this had reduced to 2,345 households. Over the past 4 years the number of households on the Council's housing register has reduced by 736 i.e. more than 28%. This cannot be dismissed by new methodology and points to a genuine reduction in households in need.	Although the numbers of households on the Council's housing register have reduced, the figures are still well in excess of supply of affordable housing.

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6.5 The only product for households	404 Director Andy Chapman	3758 Support with conditions	The need for socially rented housing can be achieved by assisting the mobility of existing tenants.	I agree that the product required is socially rented, however as indicated at 5.3, I believe this can be achieved by assisting the mobility of existing	As discussed in the answer to the comment on 5.3, in the draft SPD, some intermediate housing such as equity share

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in 'housing need' is socially rented housing. This need amounts to	(Luminus)			tenants	is envisaged, but socially rented housing is required to meet the high levels of housing need. Policy SAH/5 sets a priority order of 70% social rented housing and 30% intermediate housing. Assisting the mobility of existing tenants is a matter for Registered Social Landlords, rather than a matter for this SPD.
6.5 The only product for households in 'housing need' is socially rented housing. This need amounts to	30 Mr Martin Page (D H Barford + Co.)	4387 Object	The annual affordable housing need will be closer to 474 dwellings than 585 dwellings i.e. a 53% reduction on the 2002 Housing Needs Survey conclusion and a 19% reduction on the 2006 Housing Needs Survey Update conclusion.	As noted in relation to paragraph 2.3 above, the annual affordable housing need will be closer to 474 dwellings than 585 dwellings i.e. a 53% reduction on the 2002 Housing Needs Survey conclusion and a 19% reduction on the 2006 Housing Needs Survey Update conclusion.	The numbers in the Housing Needs Study Update 2006 are considered to be correct.
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6.6 In pursuit of a balanced housing market, mixed tenure developments, and to enable delivery, the Coun	404 Director Andy Chapman (Luminus)	3759 Support	Support		The support is noted.

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
6.6 In pursuit of a balanced housing market, mixed tenure developments, and to enable delivery, the Coun	731 Persimmon Homes East Midlands (Persimmon Homes East Midlands) 730 <i>Miss Sinead Morrissey (Pegasus Planning Group)</i>	3818 Object	The tenure split specified is too great. If these figures were to be used it could affect the viability of the scheme. Achieving the tenure split specified should depend upon receiving a full social housing grant which is not always achievable.	The tenure split specified in Paragraph 6.6 and Policy SAH/5 is too great and subsequently if these figures were to be used in the provision of affordable housing it could affect the viability of the scheme as a whole. Achieving the tenure split specified in paragraph 6.6 should depend upon receiving a full social housing grant which is not always achievable.	Paragraph 6.6 notes that the split may vary from site to site.
6.6 In pursuit of a balanced housing market, mixed tenure developments, and to enable delivery, the Coun	370 Mr Matthew Stock (Redrow Homes (South Midlands) Ltd) 219 <i>Mrs Helen Phillips (RPS Planning)</i>	4366 Object	The impact of seeking 70% social rent and 30% intermediate tenure split is considered to be too prescriptive, and where a grant is not available this will make some schemes unviable. It is therefore essential for this split to be able to vary from site to site, depending on the economies of provision.	The impact of seeking 70% social rent and 30% intermediate tenure split is considered to be too prescriptive, and where a grant is not available this will make some schemes unviable. It is therefore essential for this split to be able to vary from site to site, depending on the economies of provision.	Paragraph 6.6 notes that the split may vary from site to site.
6.6 In pursuit of a balanced housing market, mixed tenure	30 Mr Martin Page (D H Barford + Co.)	4388 Object	The intention to secure 70% social rented and 30% intermediate tenure is inconsistent with the statement in Paragraph 6.5	The intention to secure 70% social rented and 30% intermediate tenure is inconsistent with the statement in Paragraph 6.5 that there is a need to achieve 585 social rent homes and	While social rented housing is the only product considered appropriate for the 585 in 'housing need', it may be that either social rented housing,

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developments, and to enable delivery, the Coun			that there is a need to achieve 585 social rent homes and 470 intermediate homes per year. Overall the housing need would be better met by securing a mix of 55% social rent and 45% intermediate tenure.	470 intermediate homes per year. Overall the housing need would be better met by securing a mix of 55% social rent and 45% intermediate tenure.	intermediate rented housing or mixed tenure housing is appropriate for the 470 in need of intermediate housing. The 70%-30% split does not specifically relate to these numbers as the total amount of housing provided is unlikely to meet the total need. The highest need is for the social rented housing, hence the requirement for 70% of the housing to be social rented housing.

7 Supplementary Affordable Housing Policies

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7 Supplementary Affordable Housing Policies	735 Mr Michael Cramp (Flagship Housing Group)	3982 Support	Flagship Housing Group supports the policies in the document.	Flagship Housing Group supports the policies outlined within the document for delivering affordable housing within the Huntingdonshire District.	Support noted.
7 Supplementary Affordable Housing Policies	413 National Grid Property Ltd 412	4228 Object	Policy SAH/6 falls short of setting out fully the range of considerations which will be taken into account when affordable housing contributions are being considered. A related Policy	The following representation supplements representations made on behalf of National Grid in respect of the September 2006 Consultation Draft SPD - Developer Contributions Towards Affordable Housing, and should be read in conjunction with	The text in paragraph 7.23 largely addresses the matters that the objector would like to see formalised in a policy. The wording requested in the submission gives the impression of negotiation on

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	Vilna Walsh (FirstPlan)		should be inserted within Section 7 of the SPD.	<p>those submissions.</p> <p>The original representations, registered under reference 1916 and 1917, commented on the necessity for Supplementary Affordable Housing Policies - SPD to provide clarification on those circumstances where exceptions may have to be made to the requirement for affordable housing contributions on the basis of, for example, site suitability, viability and economics. The previous representations confirmed that this issue should be dealt with within a Policy and draft wording for such a policy was provided.</p> <p>It is acknowledged that within the second draft SPD additional text has been inserted to form of a new Paragraph 7.23 which goes somewhat toward clarifying the context in which affordable housing contributions will be dealt with in regard to commercial viability, and this is fully supported. The upgrading of text which previously formed supporting text and which now forms Policy SAH/6 is also supported. However, this does fall short of setting out more fully within the context of a specific policy, the</p>	<p>matters beyond the viability of the development, in conflict with government advice. However, it is agreed that it is worthwhile to include reference to viability in Policy SAH/1 which is to be amended as follows:</p> <p>'Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3,000 or more population (or 0.5ha irrespective of the number of dwellings) and on all sites in settlements of 3,000 population or less. In the remainder of the District the Council will seek 29% Affordable Housing using the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken into account.'</p> <p>Paragraph 7.6 will explain the reference to viability as follows:</p> <p>'7.6 All requirements are</p>

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				<p>range of considerations which will be taken into account when affordable housing contributions are being considered. The purpose of the document, as set out at Section 1, is to further explain and clarify policies in the Development Plan with regard to affordable housing. The range of factors which will be taken into account in determining affordable housing contributions is a key issue and should be dealt with fully within the SPD. On this basis, in addition to the retention of the new paragraph 7.23, it is considered that a related Policy should be inserted within Section 7 of the SPD as follows:</p> <p>In negotiating affordable housing contributions the Council will take into account:</p> <ul style="list-style-type: none"> i) the nature and character of the site and its surroundings; ii) the economics of provision, including whether there will be particular costs associated with the development of the site; iii) whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given 	<p>subject to the negotiation of agreements under s106 of the Town and Country Planning Act 1990. Other contributions towards infrastructure and restrictions on development may also be negotiated. In negotiating agreements, the commercial viability of the development will be taken into account. Government guidance in Circular 05/05 states that decisions on the level of contributions should be based on negotiation with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing development to take place.</p>

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				<p>priority in the development of the site;</p> <p>iv) the specific housing needs within the area;</p> <p>vi) the need to achieve a successful housing development.</p>	
7 Supplementary Affordable Housing Policies	42 Mr Paul Cronk (HBF)	4379 Other	The Council states that the draft SPD supplements policies AH1- 4. However, the actual content of the draft document seems at complete variance to these policies.	<p>The Council states that the draft SPD supplements policies AH1- 4. However, the actual content of the draft document seems at complete variance to these policies.</p> <p>Policies AH1 and AH2 regard low-cost market housing as constituting affordable housing. Policy AH3 simply sets out a target for affordable housing provision for the period 1997-2006. This period has obviously now passed. Whereas policy AH4 states that the Council will seek to achieve 29% of the total number of dwellings as affordable housing on sites of 25 dwellings or more (or 1 hectare) irrespective of the number of dwellings in settlements larger than 300 population and in settlements of 3000 population or less, on all sites, regardless of their size, subject to the effect of such provision upon the financial viability of any scheme. Factors such as site economics and the effect of affordable housing provision on other planning</p>	<p>Policies AH1, AH2 and AH3 have not been saved and therefore reference to them is to be deleted. These policies were out of date. It is agreed that reference to viability can be added. The part of Policy AH4 which refers to a threshold of 25 dwellings is overtaken by the threshold of 15 dwellings set out in PPS3 as set out in paragraph 7.7. The revised Policy SAH/1 and supporting text is:</p> <p>'Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3,000 or more population (or 0.5ha irrespective of the number of dwellings) and on all sites in settlements of 3,000 population or less. In the</p>

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				<p>objectives can be taken into account in deciding whether it is reasonable to seek the provision of affordable housing.</p>	<p>remainder of the District the Council will seek 29% Affordable Housing using the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken into account.</p> <p>7.2 The Huntingdonshire Local Plan Alteration 2002 is part of the statutory Development Plan for the District and its saved policies will apply until replaced by those in the Core Strategy of the Local Development Framework. For the part of the District outside of the Cambridge Sub Region as shown on the Map in Appendix 2, the Local Plan Alteration Policy AH4 target of 29% is the unchanged requirement.</p> <p>7.3 For that part of the District within the Cambridge Sub-Region, the requirement for Affordable Housing to be provided on eligible sites is 40% or more. This accords with the former Policy P9/1 of the Cambridgeshire Structure</p>

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					<p>Plan which was based on evidence of housing needs. This SPD was initially drafted and consulted on following the County Council issuing a Statement of General Conformity (January 2006) which said that the Local Plan Alteration was not in conformity on this matter.</p> <p>7.4 The need for a higher target than 29% is also shown in Policy H3 of the draft East of England Plan (RSS). The draft RSS is at an advanced stage of preparation with proposed changes having been published in December 2006 and further proposed changes in October 2007 with adoption expected early in 2008. Once adopted it will be part of the development plan. Policy H3 requires that delivery of affordable housing should be monitored against the expectation that some 35% of all housing coming forward over the entire region as a result of planning permissions granted after the adoption of the RSS are affordable. As Huntingdonshire, especially</p>

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					<p>the part in the Cambridge sub-region, experiences more problems with affordability than many other parts of the region the target needs to be higher than 35% in order to meet above average needs. Additionally, Affordable Housing contributions are only sought on eligible sites; therefore in order to achieve 35% of all housing coming forward as Affordable Housing it will require a percentage above 35% on eligible sites to meet the target.</p> <p>7.5 The local evidence base, including the latest housing needs surveys, demonstrates a high level of need across Huntingdonshire as explained in part 5 of this SPD. A requirement for 40% affordable housing is also consistent with Policy H7 of the Interim Planning Policy Statement and the Preferred Options for the Core Strategy which is being released at the same time as this SPD is adopted. The Strategic Housing Market Assessment is also expected to be completed</p>

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					<p>in 2007 showing a high need for affordable housing. Consideration has been given to seeking 40% affordable housing across the whole of the district, but at this stage the requirement for 29% over the part outside of the Cambridge sub-region is being maintained on the basis of the policies that existed at the time that the SPD was drafted and consulted on. The matter will be reconsidered, and the SPD revised, following the completion of the Core Strategy and Strategic Housing Market Assessment.</p> <p>7.6 All requirements are subject to the negotiation of agreements under s106 of the Town and Country Planning Act 1990. Other contributions towards infrastructure and restrictions on development may also be negotiated. In negotiating agreements, the commercial viability of the development will be taken into account. Government guidance in Circular 05/05 states that decisions on the level of contributions should be</p>

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					<p>based on negotiation with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing development to take place.</p> <p>7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha irrespective of the number of dwellings) in settlements larger than 3,000 population and to all sites regardless of size in settlements of 3,000 population or less. This policy applies equally to general needs housing developments and to specialist developments like retirement housing schemes. However, PPS3 in paragraph 29, states that the indicative minimum threshold is 15 dwellings and the indicative minimum density is 30 dwellings per hectare. The current threshold of 25 dwellings in settlements of over 3,000 population as set out in the LPA has now therefore been reduced to 15 as it has been superseded by more recent Government</p>

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					guidance. As 15 dwellings equates to 0.5 ha at a density of 30 dwellings per hectare, the site size has also been reduced to 0.5 ha to reflect the current national indicative minimum density in paragraph 47 of PPS3.
7 Supplementary Affordable Housing Policies	30 Mr Martin Page (D H Barford + Co.)	4409 Object	Cambridge City and South Cambridgeshire District Council, which have a greater housing need than Huntingdonshire, tried to argue a 50% housing target in their LDPs but this was not supported by examination inspectors, who accepted 40% provision. To reflect the lower affordable housing need in Huntingdonshire, a target of less than 40% is appropriate.	Both Cambridge City and South Cambridgeshire District Council, which have a greater housing need than Huntingdonshire, tried to argue a 50% housing target in their LDPs but this has not been supported by the examination inspectors, who have accepted 40% provision. To reflect the lower affordable housing need in Huntingdonshire, a target of less than 40% is appropriate.	The target of 40% in the Cambridge sub-region part of Huntingdonshire is consistent with the 40% target in Cambridge City and South Cambridgeshire. It is supported by the Council's own Housing Needs Surveys.
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Policy SAH/ 1	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3605 Object	The target should be set at 40% across the District as a whole.to avoid confusion	CPRE feels that the target should be set at 40% across the District as a whole. For example the draft policy SAH/1 would leave Alconbury outside the 40% zone and thus make it harder to secure Affordable Housing if Alconbury Airfield were to	This is a matter which can be re-considered in respect of the Core Strategy. At this stage it is not considered appropriate to increase the requirement beyond that which was consulted on in the draft

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				be developed as a mixed site with housing in the future. The split target policy would also encourage provision of housing outside the 40% zone which is not affordable, when these areas it could be argued are some of the areas of greatest affordability need - in our rural areas, which would be subject to limited housing development as per the Core Strategy options	document.
Policy SAH/ 1	404 Director Andy Chapman (Luminus)	3760 Object	40% should be adopted across the board	40% should be adopted across the board	This is a matter which can be re-considered in respect of the Core Strategy. At this stage it is not considered appropriate to increase the requirement beyond that which was consulted on in the draft document.
Policy SAH/ 1	404 Director Andy Chapman (Luminus)	3761 Object	should be a consistent 40%	should be a consistent 40%	This is a matter which can be re-considered in respect of the Core Strategy. At this stage it is not considered appropriate to increase the requirement beyond that which was consulted on in the draft document.
Policy SAH/ 1	404 Director Andy Chapman (Luminus)	3762 Object	should be a consistent 40%	should be a consistent 40%	This is a matter which can be re-considered in respect of the Core Strategy. At this stage it is not considered appropriate to increase the requirement beyond that which was

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					consulted on in the draft document.
Policy SAH/ 1	35 Mr Chris Blackman (Cambridgeshire County Council)	3853 Support	Policy SAH/1 is supported, although policy P9/1 of the Structure Plan, being saved beyond the end of September 2007, is still subject to Government decision.	Policy SAH/1 is supported, although the status of Policy P9/1 of the Cambridgeshire and Peterborough Structure Plan 2003, in terms of it being saved so that it will remain in operation beyond the cut-off date of 28th September 2007, is still subject to Government decision.	<p>The government decision on 27 September 2007 was not to save Policy P9/1. This necessitates an amendment to Policy SAH/1 and any other reference to Policy 9/1 and other policies that were not saved. In addition only Policy AH4 on affordable housing was saved from the Local Plan Alteration 2002. This necessitates deletion of the references to Policies AH1, AH2 and AH3.</p> <p>The consequent changes are:</p> <p>From paragraph 1.3: ...in the context of Policies AH1—AH4 of the Huntingdonshire Local Plan Alteration 2002; and Policies P5/4 and P9/1 of the Cambridgeshire and Peterborough Structure Plan 2003...'</p> <p>replace with '...in the context of Policy AH 4 of the Huntingdonshire Local Plan Alteration 2002 and updated housing needs assessments...'</p> <p>Delete Policy SAH/1 and</p>

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					<p>paragraphs 7.2 to 7.7 and replace with:</p> <p>'Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3,000 or more population (or 0.5ha irrespective of the number of dwellings) and on all sites in settlements of 3,000 population or less. In the remainder of the District the Council will seek 29% Affordable Housing using the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken into account.'</p> <p>7.2 The Huntingdonshire Local Plan Alteration 2002 is part of the statutory Development Plan for the District and its saved policies will apply until replaced by those in the Core Strategy of the Local Development Framework. For the part of the District outside of the</p>

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					<p>Cambridge Sub Region as shown on the Map in Appendix 2, the Local Plan Alteration Policy AH4 target of 29% is the unchanged requirement.</p> <p>7.3 For that part of the District within the Cambridge Sub-Region, the requirement for Affordable Housing to be provided on eligible sites is 40% or more. This accords with the former Policy P9/1 of the Cambridgeshire Structure Plan which was based on evidence of housing needs. This SPD was initially drafted and consulted on following the County Council issuing a Statement of General Conformity (January 2006) which said that the Local Plan Alteration was not in conformity on this matter.</p> <p>7.4 The need for a higher target than 29% is also shown in Policy H3 of the draft East of England Plan (RSS). The draft RSS is at an advanced stage of preparation with proposed changes having been published in December 2006 and further proposed changes</p>

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					<p>in October 2007 with adoption expected early in 2008. Once adopted it will be part of the development plan. Policy H3 requires that delivery of affordable housing should be monitored against the expectation that some 35% of all housing coming forward over the entire region as a result of planning permissions granted after the adoption of the RSS are affordable. As Huntingdonshire, especially the part in the Cambridge sub-region, experiences more problems with affordability than many other parts of the region the target needs to be higher than 35% in order to meet above average needs. Additionally, Affordable Housing contributions are only sought on eligible sites; therefore in order to achieve 35% of all housing coming forward as Affordable Housing it will require a percentage above 35% on eligible sites to meet the target.</p> <p>7.5 The local evidence base, including the latest housing needs surveys,</p>

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					<p>demonstrates a high level of need across Huntingdonshire as explained in part 5 of this SPD. A requirement for 40% affordable housing is also consistent with Policy H7 of the Interim Planning Policy Statement and the Preferred Options for the Core Strategy which is being released at the same time as this SPD is adopted. The Strategic Housing Market Assessment is also expected to be completed in 2007 showing a high need for affordable housing. Consideration has been given to seeking 40% affordable housing across the whole of the district, but at this stage the requirement for 29% over the part outside of the Cambridge sub-region is being maintained on the basis of the policies that existed at the time that the SPD was drafted and consulted on. The matter will be reconsidered, and the SPD revised, following the completion of the Core Strategy and Strategic Housing Market Assessment.</p> <p>7.6 All requirements are</p>

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					<p>subject to the negotiation of agreements under s106 of the Town and Country Planning Act 1990. Other contributions towards infrastructure and restrictions on development may also be negotiated. In negotiating agreements, the commercial viability of the development will be taken into account. Government guidance in Circular 05/05 states that decisions on the level of contributions should be based on negotiation with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing development to take place.</p> <p>7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha irrespective of the number of dwellings) in settlements larger than 3,000 population and to all sites regardless of size in settlements of 3,000 population or less. This policy applies equally to general needs housing developments and to specialist developments</p>

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					<p>like retirement housing schemes. However, PPS3 in paragraph 29, states that the indicative minimum threshold is 15 dwellings and the indicative minimum density is 30 dwellings per hectare. The current threshold of 25 dwellings in settlements of over 3,000 population as set out in the LPA has now therefore been reduced to 15 as it has been superseded by more recent Government guidance. As 15 dwellings equates to 0.5 ha at a density of 30 dwellings per hectare, the site size has also been reduced to 0.5 ha to reflect the current national indicative minimum density in paragraph 47 of PPS3.</p> <p>Paragraph 7.25 delete: The supporting text to Policy AH1 of the Huntingdonshire Local Plan Alteration states that Affordable Housing provided through developer contributions will 'normally' be secured via land values. However, the changing circumstances outlined above</p>

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					<p>demonstrate that additional contributions are required in order to achieve the aims of the policy.</p> <p>Replace with: 'The policy is intended to give some guidance on the extent to which there is flexibility in the application of affordable housing policies.'</p> <p>In Appendix 1 delete reference to the Cambridgeshire and Peterborough Structure Plan 2003 and the Policies AH1, AH2 and AH3 of the Huntingdonshire Local Plan Alteration 2002.</p>
Policy SAH/ 1	<p>370 Mr Matthew Stock (Redrow Homes (South Midlands) Ltd)</p> <p>219 Mrs Helen Phillips (RPS Planning)</p>	4359 Object	The policy should be amended to refer to an indicative target of 35% in the Cambridge Sub Region part of the District, pending the results of the HMA, and to make specific reference to the need to take account of development costs and scheme viability in negotiations with developers and in determining planning applications.	The proposed target of '40%' or more affordable housing' in the Cambridge Sub-Region presumably refers to 'new' housing as in the structure plan rather than to the whole stock. As such this target percentage is unreasonably high. Circular 05/2005 on planning obligations states that economic viability must be taken into account. 'PPS3 Housing' states that regard should be had to relevant sub-regional Housing Market Assessments and other relevant strategies and that the target should	The SPD refers to a target of 40% in the Cambridge sub-region and 29% elsewhere. This refers to new housing. Viability will be taken into account and specific reference to this added to Policy SAH/1. The forthcoming Core Strategy may have a different target, but that is not the subject of this SPD.

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				<p>take account of the anticipated levels of finance available and the level of developer contribution that can realistically be sought on relevant sites. It also proposes that local planning authorities should balance the need for affordable housing against the viability of sites in their area.</p> <p>The general direction of policy advice is therefore moving to one based on a better understanding of the local housing market and the effect upon total housing provision and affordability of different policy approaches, coupled with a realistic understanding of what can be achieved on individual sites, give the limited availability of public subsidy and development and land costs.</p> <p>The updated 2002 Housing Needs Survey may provide sufficient evidence of potential need to justify having an affordable housing policy, but it does not address the issue of scheme viability and the impact on overall housing supply. In advocating an approach in the core strategy that the Council should seek up to 40% provision across the district, the updated survey fails to appreciate the variation in size, suitability and</p>	

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				<p>viability of sites in different parts of the district and we have objected to this approach in responding to the core strategy document. The updated Needs Survey is also no substitute for a proper Housing Market Assessment (HMA).</p> <p>The policy should therefore be amended to refer to an indicative target of 35% in the Cambridge Sub Region part of the District, pending the results of the HMA, and to make specific reference to the need to take account of development costs and scheme viability in negotiations with developers and in determining planning applications.</p>	
Policy SAH/ 1	<p>329 Gallagher Estates</p> <p>328 <i>Mark Smith</i> <i>(Arup on behalf of Gallagher Estates)</i></p>	4373 Object	<p>Policy SAH/1 is inconsistent with PPS12 as it does not apply/meet the principles set out for supplementary planning documents.</p> <p>Targets are not consistent with Policy H3 of RSS14 (35%).</p> <p>The identification of a target for affordable housing should await the completion of the HMA for the Cambridge Sub</p>	<p>The Council's targets to secure affordable housing from development as set out in Policy SAH/1 of the SPD is inconsistent with PPS12 as it does not apply/meet the principles for supplementary planning documents set out in paragraph 2.43 which requires that the SPD:</p> <p>i) It must be consistent with national and regional planning policies as well as the policies set out in the development plan documents contained in the local development framework;</p>	<p>The SPD has been prepared in accordance with PPS12 and is consistent with national and regional planning policies. The Section 106 process allows for consideration of the full range of planning contributions and development costs.</p> <p>To clarify the situation regarding the relationship of this SPD with saved policies and Policy H3 of the draft RSS it is proposed to amend Policy SAH/1 and the supporting text in paragraphs 7.2 to 7.7 as</p>

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			<p>Region.</p> <p>While a broad objective of 40% affordable housing is likely to be appropriate, the SPD should recognise the actual figure agreed for housing sites will need to reflect the full range of planning contributions and the development costs for each site.</p> <p>The saved Structure Plan policies identified in Appendix E of RSS14 which the Council relies on to justify the 40% target within the Cambridge Sub-Region are scheduled to remain valid only until 28 September 2007.</p>	<p>ii) It must be clearly cross-referenced to the relevant development plan document policy which it supplements (or, before a relevant development plan document has been adopted, a saved policy)</p> <p>The Policy does not meet the first criteria of paragraph 2.43 of PPS12 (set out above) as the targets are not consistent with Policy H3 of the Proposed Changes to RSS14 that expects that 35% of housing should be affordable and requires that appropriate targets for affordable housing should take account of/be informed by:</p> <p>The objective of the RSS;</p> <ul style="list-style-type: none"> •Local assessment •of affordable housing need prepared in accordance with Government guidance; <p>The need where appropriate to set specific, separate targets</p> <ul style="list-style-type: none"> • for social rented and intermediate housing; Housing market considerations; and The Regional Housing Strategy <p>The council would need to provide a robust evidence to back the proposed figure of 40% in the</p>	<p>follows:</p> <p>Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3000 or more population (or 1ha irrespective of the number of dwellings) and on all sites in settlements of 3000 population or less. In the remainder of the District a target of 29% will apply to the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken into account.</p> <p>7.2 The Huntingdonshire Local Plan Alteration 2002 is part of the statutory Development Plan for the District and its saved policies will apply until replaced by those in the Core Strategy of the Local Development Framework. For the part of the District outside of the Cambridge Sub Region as shown on the Map in Appendix</p>

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				<p>Cambridge Sub-Region and 29% in the rest of the district, as it is not consistent with the 35% target set out in the Proposed Changes to RSS14.</p> <p>Furthermore PPS 3 (paragraph 11) states that 'Local Development Documents should be informed by a robust, shared evidence base, in particular, of housing need and demand, through Strategic Housing Market Assessment (HMA)...'. Gallagher is aware that Cambridgeshire Horizons is producing the HMA for the Cambridge Sub Region in partnership with the Cambridgeshire Districts and the County Councils (This is confirmed in paragraph 5.5 of this consultation paper). Therefore to accord with policies of the RSS and PPS3 the identification of a target for affordable housing should await the completion of the HMA for the Cambridge Sub Region which will set out the up to date requirements and needs for affordable housing within that part of the Cambridge Sub Region with the district. This is also acknowledged in paragraph 4.4 of the Development Control Policies DPD – Issues and Options document which states that 'A Strategic Market Housing Assessment is being carried</p>	<p>2, the Local Plan Alteration Policy AH4 target of 29% is the unchanged requirement.</p> <p>7.3 For that part of the District within the Cambridge Sub-Region, the requirement for Affordable Housing to be provided on eligible sites is 40% or more. This accords with the former Policy P9/1 of the Cambridgeshire Structure Plan which was based on evidence of housing needs. This SPD was initially drafted and consulted on following the County Council issuing a Statement of General Conformity (January 2006) which said that the Local Plan Alteration was not in conformity on this matter.</p> <p>7.4 The need for a higher target than 29% is also shown in Policy H3 of the draft East of England Plan (RSS). The draft RSS is at an advanced stage of preparation with proposed changes having been published in December 2006 and adoption expected in 2007. Once adopted it will be part of the development plan.</p>

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				<p>out for Cambridgeshire, this assessment will identify the long term need and demand for market and affordable housing. This assessment will be used to inform policies on the mix of housing required in new development'.</p> <p>The saved Structure Plan policies identified in Appendix E of RSS14 which the Council relies on to justify the 40% target within the Cambridge Sub-Region are scheduled to remain valid only until 28 September 2007. This means that Policy SAH/1 is not consistent with the second criteria of paragraph 2.43 of PPS12 (set out above).</p> <p>Any target on affordable housing will also need to take account of Circular 6/98 (paragraph 10), which states that '...a realistic approach to balancing the need for such housing with the viability of the development and other site specific issues- ...'.</p> <p>Gallagher may support a policy which will set a target of 40% (if this has been confirmed through the HMA) of all housing on eligible sites throughout the district to be provided as 'affordable housing' subject to the effect of such provision on the</p>	<p>Policy H3 requires that delivery of affordable housing should be monitored against the expectation that some 35% of all housing coming forward over the entire region as a result of planning permissions granted after the adoption of the RSS are affordable. As Huntingdonshire, especially the part in the Cambridge sub-region, experiences more problems with affordability than many other parts of the region the target needs to be higher than 35% in order to meet above average needs. Additionally, Affordable Housing contributions are only sought on eligible sites; therefore in order to achieve 35% of all housing coming forward as Affordable Housing it will require a percentage above 35% on eligible sites to meet the target.</p> <p>7.5 The local evidence base, including the latest housing needs surveys, demonstrates a high level of need across Huntingdonshire as explained in part 5 of this SPD. A requirement for 40%</p>

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				<p>financial viability of any proposals. The policy should acknowledge the scale of financial contributions to other s106 related requirements, as well as substantial site costs, associated with many development sites within the District. The policy should be flexibly applied and should acknowledge that there will be circumstances where a lower proportion of affordable housing (sometimes significantly below 40% will be appropriate). This would ensure that the policy accord with paragraph 29 of PPS3 which states affordable housing target should 'reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured'.</p> <p>In conclusion, while a broad objective of 40% affordable housing is likely to be appropriate, the SPD should recognise that the actual figure agreed for housing sites will need to reflect the full range of planning contributions and the development</p>	<p>affordable housing is also consistent with Council's withdrawn Core Strategy as shown in Policy H7 of the Interim Planning Policy Statement and the revised Preferred Options for the Core Strategy which is being released at the same time as this SPD is adopted. The Strategic Housing Market Assessment is also expected to be completed in 2007 showing a high need for affordable housing. Consideration has been given to seeking 40% affordable housing across the whole of the district, but at this stage the requirement for 29% over the part outside of the Cambridge sub-region is being maintained on the basis of the policies that existed at the time that the SPD was drafted and consulted on. The matter will be reconsidered, and the SPD revised, following the completion of the Core Strategy and Strategic Housing Market Assessment.</p> <p>7.6 All requirements are subject to the negotiation of</p>

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				costs (such as the additional cost associated with infrastructure provision and site remediation) for each site.	agreements under s106 of the Town and Country Planning Act 1990. Other contributions towards infrastructure and restrictions on development may also be negotiated. In negotiating agreements, the commercial viability of the development will be taken into account. Government guidance in Circular 05/05 states that decisions on the level of contributions should be based on negotiation with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing development to take place.
Policy SAH/ 1	30 Mr Martin Page (D H Barford + Co.)	4389 Object	Increasing the affordable housing requirement within the Cambridge sub-region from 29% to 40% should be the subject of scrutiny within either the Core Strategy or Development Control Policy DPD Public Examination. Any increase should be delayed pending examination by the independent inspector. The 40% identified in	There is no 'sound and robust' evidence base to underpin increasing the affordable housing on developments within the Cambridge sub-region to 40%. The facts are the quantum of affordable housing need identified in the surveys has reduced by 42.25% since 2002 and the number of households on the Council's housing register has reduced by 28% over the past 4 years. The requirement for 40% affordable	The quantum of affordable housing need has not reduced in the manner suggested in the representation. The apparent reduction in the numbers of households in need is due to changes in methodology. The need for housing still equates to a number well in excess of the number of housing units in prospect in the foreseeable future. The requirements are supported by the Housing Needs Survey Update 2006.

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			<p>Structure Plan Policy P9/1 has never been the subject of any public examination, whereas the 29% in the adopted Local Plan has.</p> <p>Since the 2002 Local Plan Alteration Inquiry the housing need has reduced by more than 42% and the number of people on the council's housing register has reduced by 28%.</p>	<p>units on new developments in the Cambridge sub-region and 29% in the rest of the district is not supported by the Housing Needs Survey Update 2006. The update identifies the difference in property and rental values between the south/east and the north/west areas of the district reduced between 2002 and 2006. In the area of greatest need i.e. 1 and 2 bed units, the difference is in the order of 4% for 1 bedroom units and just over 1% for 2 bedroom units. This small price difference does not justify an additional 11% affordable housing requirement in the Cambridge sub-region, when compared to the rest of the district.</p> <p>The 40% target for the Cambridge sub-region is inconsistent with saved Policy AH4 of the Local Plan Alteration 2002, which identifies a 29% requirement across the whole district.</p> <p>The policy purports the 40% affordable housing requirement for the Cambridge sub-region area of the district is justified by Structure Plan Policy P9/1. This states '40% or more of the new housing in the Sub-Region will be affordable, which will</p>	<p>To clarify the situation regarding the relationship of this SPD with saved policies and housing need it is proposed to amend Policy SAH/1 and the supporting text in paragraphs 7.2 to 7.7 as follows:</p> <p>'Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3,000 or more population (or 0.5ha irrespective of the number of dwellings) and on all sites in settlements of 3,000 population or less. In the remainder of the District the Council will seek 29% Affordable Housing using the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken into account.'</p> <p>7.2 The Huntingdonshire Local Plan Alteration 2002 is part of the statutory</p>

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				<p>include key worker housing'. It is important to highlight that the EIP panel into objections to the 2003 Structure Plan considered a target of 30% or more to be fully justified, but in the absence of a firm basis on which to amend the 30% target it recommended this should be reviewed in the light of a Sub-Regional Housing Needs Survey. However, the Structure Plan was adopted with a Sub-Regional target of 40%, before publication of the Cambridge Sub-Region Housing Needs Survey 2003. The 40% affordable housing target was therefore incorporated in the Structure Plan after the Examination in Public and this has not been subject to independent examination in Huntingdonshire, which is a key component of the new planning system. The affordable housing requirement must be subject to independent examination, as recommended in Circular 5/2005, and the ODPM Companion Guide to PPS12 document.</p> <p>Structure Plan Policy P9/1 does not prescribe a 40% affordable housing requirement within particular district areas, but aims to ensure that 40% or more of the new housing in the</p>	<p>Development Plan for the District and its saved policies will apply until replaced by those in the Core Strategy of the Local Development Framework. For the part of the District outside of the Cambridge Sub Region as shown on the Map in Appendix 2, the Local Plan Alteration Policy AH4 target of 29% is the unchanged requirement.</p> <p>7.3 For that part of the District within the Cambridge Sub-Region, the requirement for Affordable Housing to be provided on eligible sites is 40% or more. This accords with the former Policy P9/1 of the Cambridgeshire Structure Plan which was based on evidence of housing needs. This SPD was initially drafted and consulted on following the County Council issuing a Statement of General Conformity (January 2006) which said that the Local Plan Alteration was not in conformity on this matter.</p> <p>7.4 The need for a higher target than 29% is also shown</p>

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				<p>sub-region will be affordable. Paragraph 9.20 of the Structure Plan document clarifies 'Policy P9/1 includes a requirement for at least 40% affordable housing because needs are significant throughout the Sub-Region and are particularly great in close proximity to Cambridge...'. This is reflected in the Cambridge City Local Plan Inspector's Report where he commented 'I also find some force in the Council's argument that, if the Structure Plan aim of 40% or more for the sub-region is to be achieved then Cambridge, as a key location for new development, is likely to have to contribute a greater proportion' (Para. 5.11.12). This was also reflected in Go-East's response to the RSS document that 40% or more provision should be concentrated at the focus for sub-regional growth. Within the sub-regional context Huntingdonshire is expected to meet only approximately 16% of the housing requirement and there will be variations between authorities. Consequently, there is justification for a lower affordable housing requirement in Huntingdonshire to offset the greater need and provision in the Cambridge and South Cambridgeshire district areas.</p>	<p>in Policy H3 of the draft East of England Plan (RSS). The draft RSS is at an advanced stage of preparation with proposed changes having been published in December 2006 and further proposed changes in October 2007 with adoption expected early in 2008. Once adopted it will be part of the development plan. Policy H3 requires that delivery of affordable housing should be monitored against the expectation that some 35% of all housing coming forward over the entire region as a result of planning permissions granted after the adoption of the RSS are affordable. As Huntingdonshire, especially the part in the Cambridge sub-region, experiences more problems with affordability than many other parts of the region the target needs to be higher than 35% in order to meet above average needs. Additionally, Affordable Housing contributions are only sought on eligible sites; therefore in order to achieve 35% of all housing coming forward as Affordable Housing</p>

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				<p>The 2003 Housing Needs Survey that is used to support the Structure Plan policy noted targets should be set at local level by each Council to address the specific scale of local need and supply.</p> <p>Structure Plan Policy P9/1 has been overtaken by the more up to date evidence base in the Housing Needs Update. This identifies the quantum of affordable housing need has reduced since 2003, when the Structure Plan was adopted and the original Housing Needs Survey was published.</p> <p>In light of the above the percentage of affordable housing should specifically be addressed within the Core Strategy and Development Control Policy Documents, as required in Circular 5/2005, the DCLG document 'Planning Obligations: Practice Guidance' and the RSS Panel's recommendation. Until these documents come forward the affordable housing requirement should be based on the 2002 Local Plan Alteration, which has been the subject of independent examination. Despite the evidence of greater need the 2002 Local Plan Alteration</p>	<p>it will require a percentage above 35% on eligible sites to meet the target.</p> <p>7.5 The local evidence base, including the latest housing needs surveys, demonstrates a high level of need across Huntingdonshire as explained in part 5 of this SPD. A requirement for 40% affordable housing is also consistent with Policy H7 of the Interim Planning Policy Statement and the Preferred Options for the Core Strategy which is being released at the same time as this SPD is adopted. The Strategic Housing Market Assessment is also expected to be completed in 2007 showing a high need for affordable housing. Consideration has been given to seeking 40% affordable housing across the whole of the district, but at this stage the requirement for 29% over the part outside of the Cambridge sub-region is being maintained on the basis of the policies that existed at the time that the SPD was drafted and consulted on. The matter will</p>

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				<p>Inspector noted (Para. 3.4.4) 'there is no requirement for the Council to meet the full level of identified need for affordable housing within the plan period'. The Inspector went on 'The HNS established that there exists a significant level of affordable housing need in the district. It is therefore right that the Council should seek a significant level of housing on suitable sites. To seek more than about a third of housing on suitable sites as affordable housing would be likely to place an unreasonable burden on developers and effect the viability of sites.' Given the Inspector's assessment was against a significantly greater identified need, the increase from 29% to 40% is not justified or reasonable.</p>	<p>be reconsidered, and the SPD revised, following the completion of the Core Strategy and Strategic Housing Market Assessment.</p> <p>7.6 All requirements are subject to the negotiation of agreements under s106 of the Town and Country Planning Act 1990. Other contributions towards infrastructure and restrictions on development may also be negotiated. In negotiating agreements, the commercial viability of the development will be taken into account. Government guidance in Circular 05/05 states that decisions on the level of contributions should be based on negotiation with developers over the level of contribution that can be demonstrated as reasonable to be made whilst still allowing development to take place.</p> <p>7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha irrespective of the number of dwellings) in settlements larger</p>

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					<p>than 3,000 population and to all sites regardless of size in settlements of 3,000 population or less. This policy applies equally to general needs housing developments and to specialist developments like retirement housing schemes. However, PPS3 in paragraph 29, states that the indicative minimum threshold is 15 dwellings and the indicative minimum density is 30 dwellings per hectare. The current threshold of 25 dwellings in settlements of over 3,000 population as set out in the LPA has now therefore been reduced to 15 as it has been superseded by more recent Government guidance. As 15 dwellings equates to 0.5 ha at a density of 30 dwellings per hectare, the site size has also been reduced to 0.5 ha to reflect the current national indicative minimum density in paragraph 47 of PPS3.</p>
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.2 The	30	4390	Although the draft Regional	Although the draft Regional Spatial	The RSS has not yet been

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
Huntingdonshire Local Plan Alteration 2002 is part of the statutory Development Plan for the Dis	Mr Martin Page (D H Barford + Co.)	Object	Spatial Strategy East of England Plan proposes Structure Plan Policy P9/1 be 'saved' the document clarifies that where a conflict arises between the saved policy and policies in the East of England Plan, this will be determined in favour of the Plan. The Panel's report on the Plan mentions a target around 35%. A higher proportion should be available at Northstowe.	Strategy East of England Plan proposes Structure Plan Policy P9/1 be 'saved' the document clarifies that where a conflict arises between the saved policy and policies in the East of England Plan, this will be determined in favour of the Plan. The Panel's report on the draft RSS Plan notes 'We conclude that it is reasonable for the Plan to reflect the importance of affordable housing for the region by including an overall regional target and one of around 35% is justifiable. Such a target, if related to a wide definition of affordable housing from all the relevant sources and if applied to new permissions rather than all additional housing over the Plan period, might also be achievable. It should, however, be expressed in broad terms as a regional aspiration and not as a rigid minimum target, so as to allow flexibility for higher or lower targets to be included in LDDs on the basis of local assessments. To translate the percentage aspiration into a "top down" numerical target like the draft Policy SS13 annual figure of 7,200 affordable dwellings per annum can have little meaning for individual Districts. We do not see any benefit in seeking to elaborate or break	approved and is therefore not part of the Development Plan. It will be appropriate to review the affordable housing policies in the Core Strategy after the RSS has been approved. Nevertheless, it is considered that the target of 40% in the Cambridge sub-region and 29% elsewhere is consistent with the draft RSS target of 35% over the entire region.

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				<p>down the aspirational figure for time periods or different types of affordable housing need as it would be theoretical and not based on any real relationship with targets and provision derived from local assessments'.</p> <p>In response to the draft RSS plan the Government Office for the East of England commented 'If the Regional Housing Strategy figures were to be met entirely from new house building, then only some 13,000 of the proposed 23,900 annual provision would be available for open market sales. We do not see that reducing the supply of new homes to buy in the market will assist in making housing in the region more affordable'. With specific regard to the Cambridge Sub-Region, the government office commented that at least 40% of the new homes should be affordable at the focus for sub-regional growth i.e. Northstowe new town and on the major urban extensions of Cambridge.</p>	
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.3 The local evidence base,	30 Mr Martin	4391 Object	The RSS refers to a minimum 40% affordable housing target in the growth centres and an	The statement there is a 'high level of need across Huntingdonshire' must be considered in the context of need in	It is accepted that the affordability of housing in Huntingdonshire is on average

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including the latest housing needs surveys, demonstrates a high level of ne	Page (D H Barford + Co.)		average of 35% across the region. The fact Huntingdonshire has one of the lowest house price to income ratios in the region and has seen the lowest growth in numbers of people on the housing register over the last 10 years within the region, suggests the affordable housing provision should be less than 35% and closer to 30%.	<p>other authorities within the region. An indicator of the likely level of affordable housing need is the house price to income ratio. A high ratio will generally suggest housing is less affordable. The Joseph Rowntree Foundation in the document 'Affordability in the Intermediate Housing Market' produced by Steve Cox (2005) has looked at the ratio for all local authorities within Great Britain and within the region. In relation to Cambridgeshire, the document identifies that Huntingdonshire has the third lowest ratio within the County after Cambridge City, East Cambridgeshire, and South Cambridgeshire as detailed in Table 1. This is consistent with expectation that housing pressure and consequently property prices will be higher within and close to Cambridge city.</p> <p>TABLE 1</p> <p>Local Authority Numbers of working households Annual household earnings (£) Average house prices (£) House price to income ratios</p> <p>Cambridge City 12,546 38,066 196,027 5.15</p> <p>East Cambridgeshire 8,385 36,453 156,428 4.29</p>	better than in some other districts. Nevertheless there is a high level of need in the district, and the draft SPD seeks to address that need. It is important for developers in Huntingdonshire to provide affordable housing rather than leave the responsibility to developers in other districts.

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				<p>South Cambridgeshire 15,006 46,231 177,720 3.84</p> <p>Huntingdonshire 19,263 42,738 144,233 3.37</p> <p>Fenland 8,697 35,360 118,454 3.35</p> <p>Peterborough UA 17,210 34,219 114,137 3.34</p> <p>Source: Joseph Rowntree Foundation/Steve Wilcox 'Affordability and the Intermediate Housing Market' (2005)</p> <p>The ratio for Huntingdonshire of 3.37 is lower than the overall ratio for England (4.20) and the East of England (4.26). In fact, Huntingdonshire has the third lowest ratio in the whole East of England region, as detailed in the extract from the Joseph Rowntree Foundation document attached as Appendix B. This suggests that by comparison with nearly all other authorities in the region housing in Huntingdonshire is generally more affordable. This is reflected in the fact Huntingdonshire has seen the smallest change in numbers on the housing register in the region over the last 10 years – see Appendix 'C'. Given the RSS Panel's recommendation for an overall average 35% affordable</p>	

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				provision across the region, and the expectation provision will be higher in areas of greater need, it is reasonable that the affordable housing provision in Huntingdonshire is less than 35% and closer to 30%.	
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7.4 For that part of the District within the Cambridge Sub-Region, the requirement for Affordable Housin	30 Mr Martin Page (D H Barford + Co.)	4392 Object	The District Council should challenge the County Council's Statement of General Conformity. In the interim, pending thorough examination through new DPDs the Council should aim to secure 29% affordable housing provision across the district, in accordance with saved policy AH4 of the LPA.	Given the more up to date evidence base, we do not agree the Council is bound to accept the 40% affordable housing target for the Cambridge Sub-Region. As noted above there are legitimate reasons for challenging the County Council Statement of General Conformity and retaining the requirement in the adopted plan for 29% across the whole district	It is proposed to require 40% of more affordable housing on eligible sites in the Cambridge sub-region on the basis of up to date evidence.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.5 For that part of the District in the Peterborough and North Cambridgeshire Sub Region, the Local Pla	30 Mr Martin Page (D H Barford + Co.)	4393 Object	The Council is faced with a much greater need for private market housing. Increasing the affordable housing requirement will reduce the delivery of market units and in doing so fuel a rise in the cost of market units	The small price difference of between 1% and 4% between the south/east and the north/west areas of the district does not justify an additional 11% affordable housing requirement in the Cambridge sub-region and the rest of the district. The statement the latest Housing Need Surveys demonstrate that the targets are more than justified is erroneous	It is not the intention of the SPD to reduce the delivery of housing. Difficulties with the commercial viability of developing sites due to the need to provide affordable housing, will be taken into account in development control decisions.

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				<p>given the reduction in the quantum of affordable housing need, and that the number of households on the housing register has reduced over recent years. Furthermore, the statement does not give due regard to the high level of market need. The Housing Needs Survey Update concludes there will be an annual requirement for 6,203 market unit moves. Satisfying this level of market housing within the Structure Plan and Regional Spatial Strategy housing growth targets will be impossible. Increasing the level of affordable housing will therefore be to the exclusion of private market housing provision and this will only exacerbate the shortfall in private market housing provision, which in turn will fuel the increase in market house prices and compound the affordability difficulties across the whole housing sector. As noted in Paragraph 2.17 above this was acknowledged by Go-East in response to the RSS proposals and the intention to try and achieve 40% affordable provision within the region.</p>	
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.6 Recent evidence gathered since the	30 Mr Martin Page	4394 Object	The statement 'recent evidence gathered since the adoption of the Local Plan Alteration in 2002 demonstrates that a higher level	The statement 'recent evidence gathered since the adoption of the Local Plan Alteration in 2002 demonstrates that a higher level of	It is not true to say that the level of Affordable Housing Need has reduced between the two Needs Assessments of

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
adoption of the Local Plan Alteration in 2002 demonstrates that a	(D H Barford + Co.)		of affordable housing should be sought....' is erroneous given the fact the quantum of need has reduced by 42.25% since 2002 and the number of households on the housing register has reduced by 28% over the last 4 years.	affordable housing should be sought....' is erroneous given the fact the quantum of need has reduced by 42.25% since 2002 and the number of households on the housing register has reduced by 28% over the last 4 years.	2002 and 2006; the changes are primarily due to changes in the methodology and the overall level of need remains very high.
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7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha ir	404 Director Andy Chapman (Luminus)	3763 Support	Support		The support is noted
7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha ir	370 Mr Matthew Stock (Redrow Homes (South Midlands) Ltd) 219	4362 Object	On sites of 15 dwellings or more, a more flexible approach is needed if affordable housing is to be achieved without affecting the delivery of overall housing supply. There is no clear guidance in the document as to the amount of affordable housing required on sites in settlements with under 3,000 population. Further	With regards to requiring affordable housing on sites of 15 dwellings or more, a more flexible approach is needed if affordable housing is to be achieved without affecting the delivery of overall housing supply. This intended approach does not take account of the need to consider the effect upon total housing provision and affordability of such an approach, having regard to what can be viably achieved on individual sites, given the	The SPD will guide development control decisions. It is not appropriate to have an entirely flexible approach as developers will have little guidance on what to expect. Paragraph 7.23 indicates that commercial viability will be taken into account when considering planning applications.

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	Mrs Helen Phillips (RPS Planning)		clarification is required that has proper regard to the need to set a threshold at which schemes will remain viable and deliverable.	<p>limited availability of public subsidy and high development and land costs. The text should be amended to say that the Council will take a flexible approach that responds to individual site circumstances and development costs.</p> <p>There is no clear guidance in the document as to the amount of affordable housing required on sites in settlements with under 3,000 population. The paragraph states that in the Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more in settlements larger than 3,000 population and to all sites regardless of size in settlements of 3,000 population or less. In response to PPS3 (paragraph 29) the Council proposes to reduce the threshold to 15 in settlements to 3,000 population. There is not, however, any relevant text as to whether the threshold will be 15 dwellings in settlements with under 3,000 population, or not. Further clarification is required that has proper regard to the need to set a threshold at which such schemes will remain viable and deliverable.</p>	<p>Paragraph 7.7 explains the threshold for settlements over 3,000 population. The amended paragraph 7.7 is as follows:</p> <p>7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha irrespective of the number of dwellings) in settlements larger than 3,000 population and to all sites regardless of size in settlements of 3,000 population or less. This policy applies equally to general needs housing developments and to specialist developments like retirement housing schemes. However, PPS3 in paragraph 29, states that the indicative minimum threshold is 15 dwellings and the indicative minimum density is 30 dwellings per hectare. The current threshold of 25 dwellings in settlements of over 3,000 population as set out in the LPA has now therefore been reduced to 15 as it has been superseded by more recent Government guidance. As 15 dwellings</p>

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					<p>equates to 0.5 ha at a density of 30 dwellings per hectare, the site size has also been reduced to 0.5 ha to reflect the current national indicative minimum density in paragraph 47 of PPS3.</p> <p>Policy SAH/1 has been amended to clarify the situation for settlements with a population of less than 3,000. The amended Policy SAH/1 and as follows:</p> <p>'Within the Cambridge Sub-Region the Council will seek 40% or more Affordable Housing on sites of 15 dwellings or more in settlements of 3,000 or more population (or 0.5ha irrespective of the number of dwellings) and on all sites in settlements of 3,000 population or less. In the remainder of the District the Council will seek 29% Affordable Housing using the same thresholds. In all cases the effect of such provision upon the commercial viability of development will be taken</p>

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
					into account.'
7.7 The Local Plan Alteration 2002 Policy AH4 sets a site threshold of 25 dwellings or more (or 1 ha ir	30 Mr Martin Page (D H Barford + Co.)	4395 Object	Whilst PPS3 identifies an indicative national minimum threshold of 15 dwellings, this needs to be justified in relation to Huntingdonshire when bearing in mind the significant reduction in the number of affordable units that are required and the district's position compared to other districts in the region.	Whilst PPS3 identifies an indicative national minimum threshold of 15 dwellings, this needs to be justified in relation to Huntingdonshire when bearing in mind the significant reduction in the number of affordable units that are required and the district's position compared to other districts in the region.	The words in paragraph 29 in PPS3 are: 'The national indicative minimum site size threshold is 15 dwellings. However, Local Planning Authorities can set lower minimum thresholds, where viable and practicable, including in rural areas.' The draft SPD is in accordance with this.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.10 On schemes where these Affordable Housing policies apply, the	404 Director Andy Chapman (Luminus)	3764 Support with conditions	Does not agree with the need for planning contributions under S106 on all schemes.	I do not agree that these are necessary on all schemes and should only be allowed when they can be justified as necessary for the provision	The mechanisms in Section 106 of the Planning and Compulsory Purchase Act 2004 set the appropriate legal framework for planning obligations relating to affordable housing.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.11 The demonstrated high level of housing need in Huntingdonshire provides a clear justification for al	30 Mr Martin Page (D H Barford + Co.)	4396 Object	The Council has not demonstrated a high level of housing need that substantiates a requirement for 40% affordable housing provision in the Cambridge sub-region, when compared to other districts in the county or region.	The Council has not demonstrated a high level of housing need that substantiates a requirement for 40% affordable housing provision in the Cambridge sub-region, when compared to other districts in the county or region.	The Council has demonstrated a high level of housing need in its Housing Needs Survey as explained in Part 5 of the SPD.

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Policy SAH/ 2	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3606 Support with conditions	Support although the wording is rather vague.	CPRE supports this although we feel the wording is rather vague.	The support is noted. The policy is understandable.
Policy SAH/ 2	42 Mr Paul Cronk (HBF)	4381 Object	It is unclear as to why the Council should seek a 70% to 30% split in favour of these tenures.	Given that the requirement for social-rented housing and intermediate housing is not too dissimilar with regard to numbers, it is unclear as to why the Council should seek a 70% to 30% split in favour of these tenures. Furthermore, such an approach ignores its adopted plan policy, which has regard to the economics of provision (including other competing planning requirements), whereas PPS3 emphasises the importance of grant funding in relation to what types of affordable housing will be able to be delivered.	As explained in Paragraph 6.6 the Council seeks 70% social rented housing and 30% intermediate housing in pursuit of a balanced housing market, mixed tenure developments and to enable delivery. The paragraph notes that the split may vary from site to site.

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7.12 The latest available Housing Needs Survey Update conducted by Fordham Research confirms that only so	42 Mr Paul Cronk (HBF)	4380 Object	The Housing Needs Study update cannot be used as a basis for changing Adopted Local Plan policy requirements via SPD. The only product to meet 'housing need' is not social-rented provision.	The HBF notes that an update of the 2002 Housing Needs Study was undertaken in 2006. However, this cannot be used as a basis for changing Adopted Local Plan policy requirements via SPD. The HBF does not accept that the only product to meet 'housing need' is social-rented provision. Such a suggestion is clearly unrealistic and contrary to Government policy	The SPD does not change Local Plan policy requirements. Paragraph 6.5 states the Council's view that the only product that will provide for those defined as being in 'housing need' is socially rented housing. This is because they do not have the finance to access intermediate

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				<p>guidance, which increasingly emphasises the role of intermediate housing provision. The key worker requirement of only 4 dwellings per annum also seems highly suspect. The reality is that will be a whole range of different types of housing needs that might be addressed in a variety of different ways.</p> <p>It is stated that the Council is working with other local authorities on preparing a Strategic Housing Market Assessment. Clearly if it is to comply with the recent Practice Guide, HBF and its members will need to be represented on the project Steering Group alongside other key stakeholders.</p>	housing options. It is recognised that there is an increasing role for intermediate housing such as equity share housing.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.14 The size and type of housing units to be provided will be determined by analysing the latest Housing	323 Mr Stephen Dartford (Fenstanton Parish Council)	4226 Observations	Fenstanton is a family orientated village with a growing population of 'young' people not necessarily wishing to leave the area to get on the property ladder. Allowing for a reasonable number of 2 bedroom dwellings would help young people to start up the property ladder.	Fenstanton is a family orientated village with a growing population of 'young' people not necessarily wishing to leave the area they have grown up in to get on the property ladder. At the time the Headlands estate was built, in the 1970s the housing mix allowed for a reasonable number of 2 bedroom dwellings. This allowed young people to start their families and graduate up the property ladder as finances allowed.	The SPD is intended to help ensure that affordable housing is delivered, which will allow for a housing mix to be created.

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7.14 The size and type of housing units to be provided will be determined by analysing the latest Housing	30 Mr Martin Page (D H Barford + Co.)	4397 Object	This is contrary to paragraph 29 of PPS3, which states Local Development Plans should specify the type and size of affordable housing.	This is contrary to paragraph 29 of PPS3, which states Local Development Plans should specify the type and size of affordable housing.	Paragraph 7.14 attempts to indicate the type of size of affordable housing required in that it will be determined by analysing the latest Housing Register information available for the settlement. Any attempt to include such information in the SPD would quickly become out of date.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
Policy SAH/3	731 Persimmon Homes East Midlands (Persimmon Homes East Midlands) 730 <i>Miss Sinead Morrissey (Pegasus Planning Group)</i>	3820 Other	The provision of Free Serviced Land as specified in policies SAH3, SAH4 and SAH5 should not be considered additional to the percentage provision of affordable housing required.	The provision of Free Serviced Land as specified in policies SAH3, SAH4 and SAH5 should not be considered additional to the percentage provision of affordable housing required.	There is no intention to 'double count' any provision for affordable housing as stated in Policy SAH/1.
Policy SAH/3	329 Gallagher Estates 328	4372 Object	A requirement to provide free serviced land makes assumptions about the level of finance available which could ultimately impact on the	It is not clear how the requirements to make affordable housing contributions in the form of free serviced plots for all the potential housing sites in the District (as set out in Policy SAH3) is	The SPD has been prepared taking into account the likely economic viability of land for housing within the district. Issues of a particular site's

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	<i>Mark Smith (Arup on behalf of Gallagher Estates)</i>		viability of sites and the potential to deliver both market housing and affordable housing.	justified and supported by a clear evidence base. Gallagher contend that the policy is overly prescriptive and inflexible and does not allow for the most appropriate approach to delivering affordable housing to emerge, taking into account such issues as the scale and location of development, development economics, and the need for affordable housing. Such a policy would also conflict with paragraph 29 of PPS 3 which states that when setting an overall target for the amount of affordable housing to be provided the target should 'reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured'. A requirement to provide free serviced land makes assumptions about the level of finance available which could ultimately impact on the viability of sites and the potential to deliver both market housing and affordable housing.	viability can be dealt with in development control decisions. It is expected, as stated in paragraph 7.23, that some sites may face unusual additional costs.
Policy SAH/3	42 Mr Paul Cronk (HBF)	4382 Object	The policy introduces a new requirement for free serviced plots for affordable housing. This is a brand new	The policy introduces a new requirement for free serviced plots for affordable housing. This is a brand new requirement without any statutory local	The requirement for free serviced plots for affordable housing Policy SAH/3 is simply a restatement of the Council's

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			<p>requirement without any statutory local plan policy backing it up.</p>	<p>plan policy backing it up. Para 3.2 in the Plan simply states "it may, for example, involve the transfer to RSLs of serviced plots for free or at agricultural value, depending upon the circumstances of the scheme." This is very different from expecting it in all circumstances.</p> <p>The requirement for Free Serviced Land is contrary to Circular 56/05 B35 (para 12) "standard charges should not be applied in blanket form regardless of actual impacts". Moreover, the Housing Corporation is not a planning body, it has no control over planning matters and any directive is of little weight.</p> <p>Furthermore the requirement for Free Serviced Land is unlawful in that it is a confiscation of a property asset without compensation and the concept of Free Serviced Land has been rejected by the Inspector in the Inquiry relating to Tewkesbury Local Plan.</p>	<p>position regarding s106 contributions for affordable housing, recognising that the affordable housing is likely to depend on a transfer of the serviced plots to Registered Social Landlords. The SPD in Policy SAH/1 makes it clear that the Council is seeking (rather than requiring) free land and that this is the Council's negotiating position. The issue of viability is clearly addressed in the draft SPD and therefore it is not applied "regardless of actual impacts".</p>
Policy SAH/3	30 Mr Martin Page (D H Barford + Co.)	4398 Object	It is reasonable that the affordable housing provider should be responsible for meeting the costs of providing facilities to meet everyday requirements and ongoing management costs.	Although the transfer of free serviced plots is a long established practice, it is reasonable that the affordable housing provider should be responsible for meeting the costs of providing facilities to meet the everyday requirements of the occupiers of the new properties e.g. education improvements or open space provision.	The details of what costs are met by the affordable housing provider are likely to be dealt with at a detailed stage with developers. This does not need to be specified in the SPD.

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				Where affordable housing is sought on small private developments, such as within a flat scheme served by private courtyards etc., it is reasonable that the affordable housing provider should contribute towards the ongoing management costs. This is an accepted practice of affordable housing providers.	
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.16 Free land should be transferred to a Registered Social Landlord (RSL) for the delivery of Affordable	30 Mr Martin Page (D H Barford + Co.)	4399 Object	The statement 'free land should be transferred to an RSL' is unreasonable and unjustified. Through a Section 106 Agreement the Council is in a position to ensure that any properties delivered as affordable properties will remain affordable and available to meet local need.	Paragraph 7.27 of the Consultation SPD document notes the Housing Corporation will now work with private developers on the delivery of affordable housing. In the circumstances the statement free land should be transferred to an RSL is unreasonable and unjustified. Through a Section 106 Agreement the Council is in a position to ensure that any properties delivered as affordable properties will remain affordable and available to meet local need.	The policy SAH/3 seeks the provision of free serviced plots. The paragraph 7.16 which refers to free land simply explains what happens if the Council is successful in its negotiations. It is recognised that the appropriate mechanism is Section 106.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.17 Free serviced land is defined as that which is:	30 Mr Martin Page (D H Barford +	4400 Object	The first bullet point needs to allow for the fact some affordable housing will be provided within private courtyards and the free	The first bullet point needs to allow for the fact some affordable housing will be provided within private courtyards and the free serviced land will not therefore be provided with an	The entire development needs to have road access. The bullet point would not prevent some affordable housing being provided within private

Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
	Co.)		serviced land will not therefore be provided with an adoptable road up to the boundary.	adoptable road up to the boundary.	courtyards.
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Policy SAH/ 4	<p>731 Persimmon Homes East Midlands (Persimmon Homes East Midlands)</p> <p>730 <i>Miss Sinead Morrissey (Pegasus Planning Group)</i></p>	3821 Object	<p>Does not agree with the provision of capital contributions as discussed in Policies SAH3 and SAH4 and paragraphs 7.22 and 7.34.</p> <p>Believes the proposals go beyond the parameters of national planning policies.</p> <p>The sustainability appraisal fails to comment and justify the need for capital contributions.</p> <p>The SPD fails to recognise the need to supply lifetime homes in addition to affordable housing.</p> <p>Affordable housing may only be appropriate within certain areas due to the proximity of services and facilities.</p>	<p>Persimmon homes do not agree with the provision of capital contributions as discussed in Policies SAH3 and SAH4 and paragraphs 7.22 and 7.34.</p> <p>National Planning Policies clearly state that an assessment of local needs should be undertaken to determine the level of affordable housing to be provided as part of any new residential development Circular 05/2005: Planning Obligations outlines and reaffirms the key tests of and obligation associated with affordable housing provision, which must be:</p> <ol style="list-style-type: none"> 1. Relevant to Planning 2. Necessary to make the proposed development acceptable in planning terms 3. Directly related to the proposed development 4. Fairly and reasonably related to the scale and nature of the proposed 	<p>The provision of capital contributions is an option which allows some flexibility when considering development control decisions.</p> <p>The proposals do not go beyond the parameters of national planning policies. The document has been revised to take into account PPS3.</p> <p>The sustainability appraisal considers the draft SPD as a whole rather than individual matters such as the need for capital contributions.</p> <p>The SPD is solely about affordable housing, although it is recognised that all sorts of housing are required to meet the varied needs of the community.</p> <p>Affordable housing is needed in most areas of the district.</p>

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			<p>The SPD does not acknowledge the need to provide rural exception housing whereby affordable housing could be provided in areas of need where market housing would not be permitted.</p>	<p>development; and reasonable in all other respects.</p> <p>PPS 3 and Circular 05/2005 both advise that in most cases affordable housing provision will be met on site; provision is also made, in certain circumstances, for a financial contribution towards provision of affordable housing off-site. The use of capital contributions relating to the provision of affordable housing has not been suggested in any of the government guidance notes or circulars relating to this subject. If such a fundamental and potentially onerous requirement were to be considered acceptable or appropriate then we believe that it would be clearly stated within the latest government guidance.</p> <p>Subsequently we believe that the provision of capital contributions in policies SAH3 and SAH4 is unreasonable and goes beyond the parameters of national planning policies, capital contributions are not relevant to planning, neither are they related to the development and are not reasonably related to the scale and size of the development. Subsequently, the provision of capital contributions would represent an unwarranted tax on land and development.</p>	<p>The matter of rural exception housing is already dealt with in the existing Local Plan Alteration 2002 – policy AH5. This says the district council may relax normal restrictive open countryside development policies to permit affordable housing within, adjoining or well related to settlements of less than 3,000 population, subject to the suitability of an identified site in terms of environmental impact and the availability of necessary infrastructure.</p>

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				<p>The emerging East of England Plan and the Secretary of State's Proposed Changes to the EEP, make no reference to capital contributions in the provision of affordable housing, and likened to the recently approved PPS3 represents the Governments current thinking on the matter, and again if this was an acceptable and valid approach it would have been identified in all of these documents.</p> <p>In addition, whilst we acknowledge the inclusion of a Sustainability Appraisal: Scoping Report appended to the SPD, the sustainability appraisal fails to comment and justify the need for capital contributions and there is no justifiable need for such contributions within the sustainability appraisal objectives or the decision making criteria. Paragraph 5.2 of the Sustainability Appraisal highlights the documents that have been considered in order to create the SPD, clearly the policy documents that address affordable housing have not been considered in the correct light, as none of the documents listed mention capital contributions in support of affordable housing provision.</p> <ul style="list-style-type: none"> • The SPD also fails to recognise the 	

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				<p>need to supply lifetime homes in addition to affordable housing.</p> <ul style="list-style-type: none"> Affordable housing may only be appropriate within certain areas due to the proximity of services and facilities; in particular public transport and the SPD fails to recognise and make reference to this. The SPD does not acknowledge the need to provide rural exception housing whereby affordable housing could be provided in areas of need where market housing would not be permitted. As specified in Paragraph 30 of PPS:3 Housing 'A Rural Exception Site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities'. 	
Policy SAH/ 4	35 Mr Chris Blackman (Cambridgeshire County Council)	3856 Object	Needs to be strengthened to make clear that contributions will need to form a mainstream part of planning agreements to reach the required level of affordable housing. Therefore replace the word "may" with "will".	Policy SAH/4. The County Council repeats its previous objection to this policy, considering that it needs to be strengthened to make clear that contributions from owners/developers will need to form a mainstream part of planning agreements to reach the required level of affordable housing. Therefore we would urge the	It is considered that the draft policy SAH/4 which indicates that the Council <i>may</i> negotiate an appropriate level of capital contributions is robust as it states that this policy would come into effect if it was needed to "ensure the delivery of the required appropriate

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			<p>Housing Corporation (HC) is only expected to meet about a third of the subsidy to provide social rented housing, leaving two thirds that will have to come from planning obligations. To share this cost evenly in a situation where, for every 2 market units approx. 1 social unit is required, a 1/3 of the average subsidy per social unit is proposed as the planning obligation for each market unit. Securing contributions this way would, together with HC funding provide sufficient support to meet District targets.</p>	<p>replacement of the word "may" with "will" in the policy.</p> <p>Our reasoning for this change, as stated before, is that the Housing Corporation is only expected to meet about a third of the subsidy to provide social rented housing, leaving two thirds that will have to come from planning obligations. To share this cost evenly in a situation where, for every two market dwellings approximately one social housing unit is required, a third of the average subsidy per social housing unit is proposed as the planning obligation for each market unit. Securing contributions this way would, together with Housing Corporation funding provide sufficient support to meet District targets.</p>	<p>tenure of Affordable Housing". There may be circumstances where capital contributions may not be required and it would be invidious to collect capital contributions in such circumstances.</p>
<p>Policy SAH/ 4</p>	<p>329 Gallagher Estates</p> <p>328 <i>Mark Smith</i> <i>(Arup on behalf of Gallagher Estates)</i></p>	<p>4371 Object</p>	<p>Do not agree that the provision of free-serviced land for all development sites is appropriate. Whether free serviced land is provided will depend on the circumstances pertaining to an individual site including the viability of development. The impact of this policy would be to slow down the delivery of</p>	<p>Gallagher do not agree that the provision of free-serviced land for all development sites is appropriate (see response to policy SAH/3) and whether free serviced land is provided will depend on the circumstances pertaining to an individual site (including the viability of development). Gallagher Estates do not consider it appropriate to expect developers to provide both free serviced plots and capital for the development of affordable housing. Such an approach</p>	<p>The policy SAH/3 seeks the provision of free serviced plots. The paragraph 7.16 which refers to free land simply explains what happens if the Council is successful in its negotiations. Policy SAH/4 follows on from this, describing what might be sought in addition to free serviced land. It is recognised that the appropriate mechanism is Section 106.</p>

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			housing.	<p>could significantly impact on site viability and impact on the potential to deliver both market housing and affordable housing. This is particularly the case where there is likely to be a requirement for substantial financial contributions for other s106 related requirements (education, community facilities and transport related improvements), as well as in circumstances where there are substantial site costs (site remediation, infrastructure and utility provision).</p> <p>Gallagher is concerned that the impact of this policy would be to slow down the delivery of housing with the prospect that some development and landowners may be reluctant to release land for housing with this type of prescriptive and onerous policy (impacting on site viability) in place. In addition Circular 6/98 (paragraph 10), states that "...a realistic approach to balancing the need for such housing with the viability of the development and other site specific issues- ..."</p>	It is not the intention of the SPD to reduce the delivery of housing. Difficulties with the commercial viability of developing sites due to the need to provide affordable housing, will be taken into account in development control decisions.
Policy SAH/ 4	30 Mr Martin Page (D H Barford + Co.)	4401 Object	Any requirement for capital contributions should be set out in a DPD. If funding is not available for affordable houses, an alternative arrangement	This is unjustified and unreasonable. Any requirement for capital contributions must be clearly set out in the Core Strategy and /or Development Control Policies DPDs. Circular 5/2005 and the DCLG document 'Planning Obligations: Practice Guidance' clearly	The SPD, in setting forth that capital contributions may be sought in certain circumstances is explaining how polices in the Development Plan can be implemented and delivered.

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			<p>should be available, such as low cost market housing. A 'cascade' mechanism should be used to address the possibility of a shortfall of grant.</p>	<p>state policies on payment types should be contained in Development Plan Documents. The intention to secure contributions through the SPD document is inappropriate and contrary to the advice. Within the current development plan policy framework there is no requirement for capital payments towards affordable housing and this cannot therefore be secured through SPD.</p> <p>Paragraph 33A(c) of Circular 6/98 clarifies that 'If funding, which is necessary for the development of an affordable housing scheme, is not forthcoming by a certain date, then a specified alternative arrangement can be used, such as low cost market housing, which would still provide affordable housing on the site'. Policy SAH/4 does not reflect the advice.</p> <p>To address the possibility of a shortfall in housing grant money the SPD should incorporate a 'cascade' mechanism whereby the housing tenure mix will be altered and/or the percentage of affordable housing reduced, enabling additional development value to be released to meet any shortfall in funding.</p>	<p>There is nothing in Government guidance to indicate that such guidance must be contained in Development Plan documents. It is accepted practice that capital contributions/commuted sums can be sought through Section 106 Agreements.</p> <p>Policy SAH/5 incorporates a 'cascade' mechanism, although it is expected that the developer will provide affordable housing if grant money from the Housing Corporation is not available.</p>

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7.18 There is a high level of housing need in Huntingdonshire. The level of need for Affordable Housing	30 Mr Martin Page (D H Barford + Co.)	4402 Object	The statement 'There is a high level of housing need in Huntingdonshire' is misleading when compared with levels of affordability in other districts within the County and region. In light of Paragraph 2.3 above and the conclusion the affordable housing requirement is in the order of 474 dwellings per annum, the second sentence is incorrect.	The statement 'There is a high level of housing need in Huntingdonshire' is misleading when compared with levels of affordability in other districts within the County and region. In light of Paragraph 2.3 above and the conclusion the affordable housing requirement is in the order of 474 dwellings per annum, the second sentence is incorrect.	It is accepted that other districts also currently have high levels of housing need. Nevertheless, there is a high level of housing need in Huntingdonshire. The second sentence is correct as the need is the total assessed need is 1055 houses per year (585 socially rented houses and 470 intermediate houses), which is in excess of the 559 new build target (it is 188%).
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7.20 Grant funding from the Housing Corporation (HC) is now secured via a competitive bidding process whi	731 Persimmon Homes East Midlands (Persimmon Homes East Midlands) 730 <i>Miss Sinead Morrissey (Pegasus Planning Group)</i>	3819 Other	If the social housing grant (in paras 7.19 and 7.20) cannot be achieved/granted then there must be a mechanism to negotiate the appropriate tenure split, during the planning application process.	If the social housing grant (specified in paragraphs 7.19 and 7.20) cannot be achieved/granted then there must be a mechanism to negotiate the appropriate tenure split, during the planning application process.	Negotiations on the appropriate tenure split will occur when considering resource consent applications and S106 agreements.
7.20 Grant funding from	30 Mr Martin	4403 Object	In light of the comment that funding was only	Paragraph 29 of the PPS3 states that when determining the overall target for	The draft SPD, released in June 2007, was written at a

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the Housing Corporation (HC) is now secured via a competitive bidding process whi	Page (D H Barford + Co.)		<p>achieved for approximately a third of the bid, the Council must substantiate that funding will be available to deliver its proposed levels of affordable housing.</p>	<p>affordable housing local planning authorities should have regard to a number of factors, including the likely levels of finance available for affordable housing. In light of the comment that funding was only achieved for approximately a third of the bid, the Council must substantiate that funding will be available to deliver its proposed levels of affordable housing.</p> <p>The Council's draft Housing Strategy 2006-11 document notes that over the period 2004-06 Housing corporation funding of £6m was secured and that £7m has been secured for the period 2006-08, sufficient to fund 255 new homes i.e 127 dwellings per year over the period 2006-08. With the RSS housing target of 559 dwellings per year, 40% affordable provision would equate to 224 affordable dwellings per year. Clearly public funding will not be sufficient to deliver this proposed level of affordable housing.</p> <p>The Council's draft Housing Strategy 2006-11 notes 'The resources awarded to Huntingdonshire and the rest of Cambridge sub-region are insufficient to fund the affordable housing that can be developed in the period'. If the level of funding is insufficient to achieve 29% affordable units, then a 40% target in</p>	<p>time when securing funding from the Housing Corporation was difficult. The Housing Green Paper <i>Homes for the Future</i>, released in July 2007 announced investment of at least £8 billion in affordable housing in 2008-11, offering a £3 billion increase over the current funding period. The Green Paper sets out the Government's ambition to meet the country's need for social homes, to tackle housing affordability and to support quality and sustainability through the National Affordable Housing Programme (NAHP). It is reasonable to delete the last sentence of paragraph 7.20 and replace it as follows: It is clear that these resources alone will be insufficient to enable delivery of Affordable Housing in keeping with need. The Housing Green Paper <i>Homes for the Future</i>, released in July 2007 announced investment of at least £8 billion in affordable housing in 2008-11, offering a £3 billion increase over the current funding period. The bidding criteria through which affordable home providers will</p>

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				<p>parts of the district is unrealistic.</p> <p>The statement 'resources alone will be insufficient to enable delivery of Affordable Housing in keeping with need' confirms the SPD proposal does not have regard to the advice in paragraph 29 of PPS3 that targets should take account of the likely level of finance available for affordable housing. The affordable housing target is therefore over ambitious and does not reflect the advice.</p>	<p>access Government funds was announced in September 2007, with the publication of the Housing Corporation's <i>Prospectus for its 2008-11 National Affordable Housing Programme (NAHP)</i>. For the first time the Corporation's programme covers a full three year period.'</p>
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
Policy SAH/ 5	<p>91 Church Commissioners</p> <p>335 <i>Mr Ian Smith (Smiths Gore)</i></p>	<p>4374 Object</p>	<p>The order of priority is unreasonable as it may affect a specific proposal progressing through the applications stage. SPDs should explain and clarify existing development plan policies but SAH/5 goes beyond that by introducing additional requirements in the event that there is no grant available.</p>	<p>We object to Policy SAH/5 and to its accompanying supporting text at paras 7.21 to 7.23. Whilst we understand that the three scenarios presented represent an order of priority for the Council in securing affordable housing provision it is wholly unrealistic to impose this priority order on landowner/private developers because:</p> <ol style="list-style-type: none"> 1. Such an approach provides zero certainty to landowners and developers who cannot possibly know whether or not RSLs have appropriate grant or not at an early stage of any scheme. 2. The above point will make it virtually impossible for housing land to be appraised prior to an application, prior 	<p>The bidding criteria through which affordable home providers will access at least £8 billion in government funds was announced in September 2007 by the Housing Corporation. The Corporation's Prospectus for its 2008-2011 National Affordable Housing Programme (NAHP) may increase the certainty which is of concern to the objector. Policy SAH/5 does not go beyond existing development control policies.</p>

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				<p>to purchase, to be valued or for meaningful pre-application discussions when the costs of developing a site cannot be defined.</p> <p>3. The availability of grant (or not) and the level of grant is a matter which is entirely outside the control of applicants. It is therefore quite unreasonable to impose additional obligations on applicants because, for example, there is no grant available to a particular RSL or at a particular point in time; and</p> <p>4. The above mean that the order of priority is unreasonable insofar as it may affect a specific proposal progressing through the applications stage. Supplementary Planning Documents are meant to further explain and clarify existing development plan policies but SAH/5 goes beyond existing development plan policies by introducing additional requirements in the event that there is no grant available. SPD should provide greater certainty – but SAH/5 will have the opposite effect.</p>	
Policy SAH/ 5	30 Mr Martin Page (D H Barford + Co.)	4404 Object	A better balance would be secured through a mix of 55% social rent and 45% intermediate tenure.	The aim to maximise the number of social rented units is inconsistent with the statement in Paragraph 6.5 that there is a need to achieve 585 social rent homes and 470 intermediate	It is recognised that the full number of 1055 houses per year needed is unlikely to be provided, particularly given that the total housing requirement

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			<p>Policies on payment types should be in DPDs.</p> <p>Option 2 needs to clarify that securing free serviced land plus dwellings should be equivalent in financial terms for the developer as Option 1.</p> <p>Option 3 cannot be justified as a capital contribution is not a requirement of the current development plan policies.</p>	<p>homes per year. In relation to meeting the overall need a better balance would be secured through a mix of 55% social rent and 45% intermediate tenure.</p> <p>Circular 5/2005 states policies on payment types should be contained in Development Plan Documents. The intention to secure contributions through the SPD document is inappropriate and contrary to the advice.</p> <p>Option 2 needs to clarify that securing free serviced land plus dwellings should be equivalent in financial terms for the developer as Option 1 i.e. that free serviced land plus fewer completed dwellings will be equivalent in value to transferring the appropriate free serviced land.</p> <p>Option 3 cannot be justified as a capital contribution is not a requirement of the current development plan policies.</p>	<p>is only 559 houses per year. The priority is for socially rented homes, hence the 70%-30% split. Policy SAH/6 allows for a different tenure mix in some situations.</p> <p>It is anticipated that the Core Strategy will revisit the issue of affordable housing. This SPD will then be revised.</p> <p>The precise financial terms are matters to be considered in development control decisions.</p> <p>It is considered that it is appropriate to state the Council's policy in respect of capital contributions in the SPD. The Inspector at the Bydand Lane inquiry specifically referred in paragraph 45 of his report to the fact that in terms of local policy, there was no SPG regarding capital contributions for Affordable Housing. This indicated clearly that if there had been an approved SPG/SPD in place he would have come to a different conclusion.</p>

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7.22 Section 106 agreements will be drafted to allow any of the three options above to be taken up in the	42 Mr Paul Cronk (HBF)	4383 Object	It is not for the Council to dictate the terms of Section 106 agreements. It is unrealistic and unreasonable to expect any capital contribution to be paid prior to occupation of the first open market unit.	It is not for the Council to dictate the terms of Section 106 agreements; it is for the relevant parties to agree their content to the satisfaction of each and every party involved. Given that the sale of market housing will be necessary to subsidise the affordable housing element of the scheme, it is clearly unrealistic and unreasonable to expect any capital contribution to be paid prior to occupation of the first open market unit.	It is accepted that each party must agree the content of the Section 106 agreement. First occupation often occurs some considerable time after the start of development which is the alternative trigger which the Council could use. It is therefore considered that this is entirely reasonable.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
Policy SAH/ 6	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3607 Object	Affordable housing should be located in all developments and with a mixture of housing throughout the site. Policy SAH/6 would be contrary to policy SAH/8.	Affordable housing should be located in all developments and with a mixture of housing throughout the site. This policy would be contrary to policy SAH/8 - as it could lead to sites being developed without any affordable housing provision, and lead to areas of development on poorer quality sites for affordable housing and other better quality sites without any affordable housing. Government policy is trying to move away from this approach to development	Policy SAH/6 is not contrary to Policy SAH/8. The latter policy indicates that where affordable housing is provided, it should be distributed throughout the site. PPS3 sets a standard of requiring affordable housing in developments of more than 15 dwellings, and that standard has been adhered to in this guidance.
Policy SAH/ 6	370 Mr Matthew Stock (Redrow Homes (South Midlands) Ltd)	4360 Object	There should be a further option that is based on no affordable housing being provided on the site if the site is not suitable or viable.	Whilst there are three options that the Council can consider with regards to site viability, it is considered that there should be a further option that is based on no affordable housing being provided on the site if the site is not suitable or viable. The third option in proposed	It is not accepted that the options provided in Policy SAH/6 are not sufficient. Circular 05/2005 is summarised in Appendix 1 and the relevant paragraph B10 is summarised. It is recognised

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	<p>219 Mrs Helen Phillips (RPS Planning)</p>			<p>Policy SAH/6 does not appear to offer an approach that would assist the viability of the scheme, if the contribution was expected to be in lieu of on site provision in full. This policy suggests that off site provision would be appropriate only if the site was unsuitable for location reasons or because the cost of construction of the affordable housing would be higher than normal. It is considered that where the viability and deliverability of the housing development would be prejudiced by the provision of an element of affordable housing this should therefore be regarded as an unsuitable/ unviable site and hence a reason for not seeking affordable housing at all on that scheme. This would be in accordance with advice in paragraph B10 of Circular 05/2005.</p>	<p>that where the economic viability of a development is threatened, the level of contributions should be reasonable. Such matters will be dealt with in development control decisions.</p>
<p>Policy SAH/ 6</p>	<p>91 Church Commissioners</p> <p>335 Mr Ian Smith (Smiths Gore)</p>	<p>4375 Object</p>	<p>Do not believe the situation is as simple as implied by SAH/6 in terms of assessing site viability. There is nothing in the SPD to suggest how the Council will assess this.</p>	<p>We object to Policy SAH/6 and its supporting text at paras 7.24 to 7.25. Given our comments to SAH/5 then we do not believe the situation is as simple as implied by SAH/6 in terms of assessing site viability. Our concerns are as follows:</p> <ul style="list-style-type: none"> • In approaching the appraisal of a development site an applicant may make assumptions (based on existing policy and the emerging Core Strategy) about the likely level of affordable housing that will be required. Should there 	<p>The SPD gives developers some certainty as to the likely requirements so that these can be factored into development assumptions early in the process. It is accepted that the situation is not simple and that negotiations on Section 106 agreements when there are issues relating to a site's viability sometimes take a long time.</p>

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				<p>subsequently be no grant available then the applicant could be faced with additional financial requirements under SAH/5 – but this does not necessarily mean that the whole development is unviable – but that the basis of site valuation and design has changed;</p> <ul style="list-style-type: none"> • Thus it is not necessarily possible to establish that the site is unviable and there is nothing in the SPD to suggest how the Council will assess this anyway; • Viability issues apply from the first time a site is identified and development and valuation matters are being considered. It cannot be right that an applicant makes reasonable assumptions about how affordable housing might be considered (i.e. the amount and its costs) only for that to be completely changed probably at the time of negotiating the S106 for reasons outside of the applicant's control. 	
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
7.25 The supporting text to Policy AH1 of the Huntingdonshire Local Plan Alteration states that Affordable..	30 Mr Martin Page (D H Barford + Co.)	4405 Object	Planning obligations policies should be contained in the Core Strategy.	The Department for Communities and Local Government Document 'Planning Obligations: Practice Guidance' (2006) clarifies local authorities 'should use the Core Strategy to outline their high level planning obligations policies' and that 'Core Strategies will generally cover	This SPD is based on current evidence. It is the Council's intention to revisit these issues in the Core Strategy process. The current SPD will then be revised.

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				<p>the circumstances in which planning obligations will be sought ... the range of infrastructure facilities and services for which contributions are likely to be sought for different types of development and the types of contribution that will be sought....' (Paragraph 3.10). The document also clarifies 'It is important that all planning obligation policies are informed by The Department for Communities and Local Government Document 'Planning Obligations: Practice Guidance' (2006) clarifies local authorities 'should use the Core Strategy to outline their high level planning obligations policies' and that 'Core Strategies will generally cover the circumstances in which planning obligations will be sought ... the range of infrastructure facilities and services for which contributions are likely to be sought for different types of development and the types of contribution that will be sought....' (Paragraph 3.10). The document also clarifies 'It is important that all planning obligation policies are informed by a sound and robust evidence based, for example an up to date assessment of the need for, impacts on and costs of necessary infrastructure related to development'. (Paragraph 3.18). This reflects the advice in paragraph 1 of Circular 6/98 that there should be evidence of need for affordable</p>	<p>Paragraph 7.25 is no longer appropriate as it related to Policy AH1 and its supporting text in the Local Plan Alteration which was not saved on 27 September 2007. It is not clear why the objector is concerned about the paragraph as it is favourable to developers in that it explains that there is some flexibility in the application of the policies. The whole paragraph should be amended to include the following new text:</p> <p>'The policy is intended to give some guidance on the extent to which there is flexibility in the application of affordable housing policies.'</p> <p>This replaces the existing paragraph 7.25:</p> <p>The supporting text to Policy AH1 of the Huntingdonshire Local Plan Alteration states that Affordable Housing provided through developer contributions will 'normally' be secured via land values. However, the changing circumstances outlined above</p>

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				housing. Additional contributions in the form of payments must be justified within the development plan policies. Policy AH1 of the Huntingdon Local Plan Alteration does not require capital payments.	demonstrate that additional contributions are required in order to achieve the aims of the policy.
Item	ID / Name	ID / Type	Summary	Representation	Officer's Recommendation
Policy SAH/ 8	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3608 Support	Support	We strongly support mixed housing types and affordability throughout a site. In the past Affordable homes have tended to be pushed to less popular parts of a site e.g adjacent to railway lines etc. It also leads to social exclusion. To create balanced communities housing provision of all types should be evenly mixed throughout a site.	The support is noted
Policy SAH/ 8	35 Mr Chris Blackman (Cambridgeshire County Council)	3858 Support	The County Council supports this policy, which will lead to greater social inclusion than a separate approach.	The County Council supports this policy, which will lead to greater social inclusion than a separate approach, and is in the spirit of Structure Plan policy P1/3 - all new development takes account of community requirements by including a mix of housing opportunities.	The support is noted
Policy SAH/ 8	350 Fairview New Homes 349 Wai-kit Cheung (RPS Planning)	4370 Object	Object to the Council's proposal whereby it would require affordable housing to be distributed throughout the site of a residential	Fairview object to the Council's proposal whereby it would require affordable housing to be distributed throughout the site of a residential development (policy SAH/8). Fairview considers that the distribution of affordable and market housing throughout a residential site would incur unnecessary costs to the	The Council seeks pepper-potting to avoid over-concentration of Affordable Housing dwellings in one area of a site, and thus avoid social exclusion. The management issues cited are not known to occur since a Registered

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			development.	potential social housing tenants in the form of market rate service charges. It is considered that Registered Social Landlords (RSLs) cannot absorb these costs; affordable housing occupiers cannot afford to pay them and it would be unreasonable for the developer/private occupier to take on such an open financial commitment. In addition, it is often more costly and inconvenient for RSLs to manage housing that is dispersed across a large site and that it is more economic to manage a group of houses together than if they are pepper-potted across an area, be it a larger expansion or throughout the established parts of a town. Therefore, Fairview would strongly argue against the 'pepper potting' of residential development.	Social Landlord (RSL) can adequately manage stock that is distributed throughout the site. None of the RSLs consulted on the draft SPD have objected to this policy. It may be possible to cluster some of the affordable housing in large developments anyway, as explained in paragraph 7.28.
Policy SAH/ 8	91 Church Commissioners 335 <i>Mr Ian Smith</i> <i>(Smiths Gore)</i>	4376 Object	Policy conflicts with wording in para 7.28 - the policy requires affordable housing to be distributed throughout a residential development site whereas paragraph 7.28 indicates that it can be in clusters of up to 15 units. Policy takes no	We object to Policy SAH/8 and its supporting text at paras 7.28 to 7.29 for a number of reasons: 1. The policy seems to conflict with the wording in paragraph 7.28 in that the policy requires affordable housing to be distributed throughout a residential development site whereas paragraph 7.28 indicates that it can be in small clusters of up to 15 units; 2. The policy takes no account of the fact that affordable dwellings may be in the form of apartment blocks;	The policy seeks the distribution of affordable housing throughout the site of a residential development, but as explained in paragraph 7.28, this may mean scattering individual units or small clusters. The limit of a cluster is 15 dwellings and such a number would only be appropriate in very large developments, for example where there is an apartment building. The developer will need to

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			<p>account of the fact that affordable dwellings may be in the form of apartment blocks.</p> <p>Dispersal of affordable dwellings will result in higher unit construction & management costs for the RSL and lead to piecemeal development of a site if the RSL does not have funds available to progress at the same pace as a private developer .</p> <p>Rather than use a maximum cluster size of 15 dwellings it would be better to use a percentage figure – the % being a proportion of the total number of units.</p>	<p>3. In some situations – there may be an outline planning permission specifying the level of affordable housing and a developer is ready to progress a detailed reserved matters application but the RSL is not in a position to progress its affordable housing. The approach put forward under SAH/8 will simply not work in such circumstances;</p> <p>4. Dispersal of affordable dwellings throughout a site will result in higher unit construction costs for the RSL as economies of scale may not be achieved. Management and maintenance costs are also likely to be higher for the RSL;</p> <p>5. Dispersal could also lead to very piecemeal development of a site if the RSL does not have funds available to progress affordable units at the same pace as a private developer builds its units. This would be a very unsatisfactory scenario;</p> <p>6. In the light of the above we believe there are important practical constraints to the cost-effective delivery of affordable housing spread throughout a development site. The size of a site is important and rather than use a maximum cluster size of 15 dwellings it would be better to use a percentage figure – the % being a proportion of the total number of units.</p>	<p>negotiate with the Registered Social Landlord to ensure an appropriate sequence and phasing for the development of both market and affordable housing.</p> <p>The unit construction costs should not vary when one developer builds both the affordable and market housing. The management issues cited are not known to occur since a Registered Social Landlord (RSL) can adequately manage stock that is distributed throughout the site. None of the RSLs consulted on the draft SPD have objected to this policy.</p> <p>It may be that a % figure of the total number of units could have been derived, but in the absence of any suggestions in objections it is considered appropriate to retain the maximum cluster size in this SPD.</p>

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Policy SAH/ 8	30 Mr Martin Page (D H Barford + Co.)	4406 Observations	In considering distribution of affordable housing, account must be taken of potential delivery complications in terms of land transfer, phasing and timescales. The situation may arise where the main developer will not construct affordable housing, with the prospect for developments remaining incomplete. Affordable housing should generally be concentrated within appropriate clusters.	In considering the distribution of affordable housing, account must be taken of potential delivery complications in terms of land transfer, phasing and timescales. The situation may arise where the main developer will not construct affordable housing, with the prospect for developments remaining incomplete. For practical and common sense reasons, affordable housing should generally be concentrated within appropriate clusters.	The Council seeks pepper-potting to avoid over-concentration of Affordable Housing dwellings in one area of a site, and thus avoid social exclusion. The developer will need to negotiate with the Registered Social Landlord to ensure an appropriate sequence and phasing for the development of both market and affordable housing. It may be possible to cluster affordable housing in large developments anyway, as explained in paragraph 7.28.
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Policy SAH/ 9	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3609 Support	Support	Strongly Support	The support is noted.
Policy	30	4407	Additional wording should	Additional wording should be added to	It is up to the developer to

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SAH/ 9	Mr Martin Page (D H Barford + Co.)	Object	be added to make it clear the Council will not prevent construction of market units where the delivery of affordable housing units may be delayed because of funding complications beyond the control of the developer.	make it clear the Council will not prevent construction of market units where the delivery of affordable housing units may be delayed because of funding complications beyond the control of the developer.	ensure that the timing of permissions and development fits in with the timings required by the Registered Social Landlord. Paragraph 7.30 states that planning conditions will be used to ensure that a specified number of market housing cannot be occupied until the affordable housing sites have been transferred to a RSL. For smaller sites and the first phase of larger developments it is expected that the land for affordable housing should be transferred to the RSL prior to the commencement of the development.
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Policy SAH/ 10	172 Mr Gareth Ridewood (CPRE Cambridgeshire)	3610 Object	There is no clear definition of exceptional.	We believe all sites should contain affordable housing. Who defines 'exceptional' - there is no clear definition in the SPD	Paragraph 7.32 and paragraph 7.34 attempt to indicate what the exceptional circumstances might be that would result in affordable housing being provided off-site or financial payments made in lieu. These relate to the location of the site or extraordinary financial reasons. There is an error in paragraph 7.34 which refers to paragraph 7.30 instead of

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					<p>paragraph 7.32 – amending this as follows will help make the policy clearer: ‘The justification may be similar to 7.30 7.32 above’.</p> <p>There is also an error in paragraph 7.33 which refers to phasing principles in Policy 6 which should be Policy SAH/9 – to be amended as follows: ‘The Council will also require the phasing of the two developments to be linked, consistent with the principles established in Policy 6 SAH/9’.</p>