

INTERNAL CONSULTATION

TO: Emma Worley

FROM: Lisa Jones
Housing Development Officer
Housing

OUR REF: 22/0163/aff

OUR REF: W/22/00201/OUT

DATE: 25/02/2022

Description: Outline planning application for the erection of up to 102 dwellings, new vehicular access and pedestrian access, and associated works. All matters reserved except for access

Location: Land At (Os 8894 6544)
Kidderminster Road
Hampton Lovett

Applicant: Beechcroft Land Ltd & Henry Bouskell

Case Officer: Emma Worley

REPLY TO D.C. REQUEST

This application proposes a residential development of 102 residential dwellings on a site that is Outside the Development Boundary of the South Worcestershire Development Plan.

The Council's document titled 'formal position with respect to affordable housing and tariff style developer contributions following the publication of National Planning Policy Framework 2021' states that on sites of 15 or more dwellings, on greenfield land, 40% of the units should be affordable and provided on site. For 102 dwellings, this equates to 40.8 affordable homes. This application proposes 41 dwellings and therefore meets this policy requirement.

In terms of tenure split, the Council's Affordable Housing Supplementary Planning seeks 80% social rented and 20% intermediate housing products. However, as of 28/12/2021, a minimum of 25% of all affordable housing through developer contributions must be delivered as First Homes (further details relating to First Homes below).

Therefore, it is sometimes necessary for the tenure split to be amended to comply with this requirement. For this application of 41 affordable dwellings, the required tenure split is 73% social rented (30 dwellings) and 27% First Homes (11 dwellings).

It is understood that the application does not propose tenure mix or property sizes.

The evidence of affordable housing need for the area is as follows:

The Strategic Housing Market Assessment (SHMA) (2019) – Indicates a minimum net imbalance of 43 affordable dwellings each year over the next five years across Wychavon District.

Housing Register (Housing for you) – As at 24/02/2022, Housing for You data showed that there were 1877 households registered with a banding which indicates that they have a local connection to the Wychavon District. These households have the following bedroom need:

- 1 bed – 960
- 2 bed – 561
- 3 bed – 279
- 4 bed – 72
- 5 bed – 5

As the site is located in a rural area, the Council's rural lettings policy would apply when allocating affordable housing. Priority would be given to households with a local connection to the parish of Hampton Lovett in the first instance, followed by those households with a local connection to one of the surrounding parishes (Westwood, Dodderhill, Upton Warren, Elmbridge, Elmley Lovett, Doverdale, Ombersley).

As at 24/02/2022, Housing for You data shows that there are 0 households registered with a local connection to the parish of Hampton Lovett. These households have the following bedroom need:

There are a further 7 households registered with a local connection to one of the surrounding parishes. These households have the following bedroom need:

- 1 bed - 3
- 2 bed – 3
- 3 bed – 1

Housing Officers note that the Town of Droitwich is adjacent to Hampton Lovett parish and this need would become relevant after following the Rural Letting Policy cascade. As of 24/02/2022 there were 385 households registered with a local connection to Droitwich. They have the following bedroom need:

- 1 - 191
- 2 - 117
- 3 - 56
- 4 - 21

The above may be an under representation of housing need as it is not possible from our current reporting system to establish how many households have a local connection to the parish/surrounding parishes through employment or close family links.

Parish Housing Needs Survey – There is no up to date Housing Needs Survey for the parish of Hampton Lovett which has been carried out by Wychavon District Council.

This application currently does not detail tenure split or property sizes for the affordable housing provision. Housing Officers would like to advise that a property mix including a range of property types would be welcome to meet the identified need.

Housing officers would welcome a higher portion of 1 bed accommodation as this presents a significant need. There is preference for all 1 bed units to have their own front doors leading onto the street to minimise communal entrances and corridors. In addition, a small provision of 4 bed accommodation would be supported to meet identified need.

Housing Officers wish to advise that affordable dwellings should be spread out throughout the scheme. The Affordable Housing Supplementary Planning Document also sets out the requirements for tenure blindness and the avoidance of clustering (ref 4.3 (b) and 4.3 (c)).

Social Rent levels are strongly preferred due to high unaffordability within the district and Housing Officers would not be supportive of affordable rent levels unless there are evidenced justifications for this.

Housing Officers encourage the Nationally Described Space Standards in terms of the size of affordable dwellings

First Homes

It should be noted that from 28/12/21, a minimum of 25% of all affordable housing through developer contributions must be delivered as First Homes.

First Homes is a Government initiative that aims to provide a new model of affordable housing to help aspiring homeowners get on the property ladder with a house, with at least a 30% discount on open market value. On 24 May 2021, the Government published new Planning Practice Guidance and a Written Ministerial Statement setting out how it expects First Homes to be delivered.

The Government's Guidance on First Homes can be viewed [here](#) and the written ministerial statement [here](#)

The Planning Practice Guidance sets out the main requirements for First Homes:

- *They must be discounted by at least 30% against open market value (although higher discounts of 40% or 50% can be applied through Local Plans or Neighbourhood Plans where supported by evidence);*
- *Prices to be capped at no more than £250,000 (nationally excl Greater London) after the discount (although lower price caps can be applied through Local Plans or Neighbourhood Plans where supported by evidence);*
- *First and subsequent sales must be to households meeting national eligibility criteria, with optional local criteria (e.g. local connection or occupation criteria); and*
- *The discount is to be secured through a restriction on the title with the Land Registry. First Homes will benefit from mandatory CIL relief. Provision of First Homes will be secured through Section 106 agreements, and the Government has published model wording for this. A Mortgagee Exclusion Clause is set out to protect lenders to encourage competitive lending against First Homes.*

In policy terms, the Government expects a **minimum of 25% of all affordable housing through developer contributions to be First Homes**, to be delivered on-site unless off-site provision or financial contributions can be robustly justified.

The national PPG states the following for applying to existing policies: 'Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.'

The Council currently seeks 80% social rented and 20% intermediate/home ownership tenures, as set out in the Affordable Housing Supplementary Planning Document. With the introduction of First Homes this is now not possible (as 80%

social rent would mean only 20% First Homes could be delivered), social rent must therefore reduce to 75% to ensure that we can obtain 25% First Homes.

Therefore, 25% of developer contributions should be provided as First Homes, and all remaining dwellings should all be social rented, unless there is a demonstrated need for an alternative affordable housing tenure split.

For specific development schemes through the planning application process, First Homes requirements do not apply where:-

1. full or outline permission is granted before 28 December 2021,
2. there has been “significant pre-application engagement” on affordable housing matters and permission is granted before 28 March 2022