

Response to the consultation on the CBC Housing Technical Policy Guidance SPD

Flitwick Town Council

With contributions from the Planning Improvement Working Group

Submitted on 16th March 2023

General Comments

The Town Council welcomes the clarity from Central Bedfordshire Council on its interpretation of the requirements of the Local Plan policies relating to housing. The observations of the Planning Improvement Group (PIWG) at Flitwick Town Council is that for a number of years, each site has been considered in isolation, with varying interpretations of Local Plan policy. Therefore, this SPD is welcome in providing a necessary direction.

The PIWG has a number of specific observations relating to different policies contained within the SPD. But we also have a number of more broader observations to make.

We would recommend that, as a standard, the planning system when it comes to the delivery of housing developments be open and transparent. Previously, the Town Council has struggled to secure data on planning matters when it comes to housing delivery in the town. Therefore, we would expect the following be published as a matter of course, and in an easily accessible format:

- The number of dwellings for which permission has been granted, including the proposed mix of dwelling types;
- Planning obligations associated with developments at a neighbourhood level (e.g. Flitwick), including progress on the spend and delivery of those obligations;
- Planning conditions associated with developments at a neighbourhood level, including any commentary and updates on the delivery of those conditions;
- For major housing sites, a simplified timeline of the delivery stage of each site. Stages in such a timeline could be as so:
 - In the Adopted Local Plan
 - Supplementary Planning Document
 - Pre-application discussion
 - Planning application
 - Planning decision
 - Negotiation of obligations
 - Delivery
 - Site completed

The delivery of housing policies in a manner that provides confidence in the ability to deliver against Local Plan targets, as well as providing certainty to local communities and developers, is to publish progress openly with accessible data that is easy to interpret. We consider that the SPD should make a commitment to this transparency as a means of delivering against these housing targets.

Additionally, we would recommend deferring the adoption of the SPD pending the outcomes of the [consultation into changes to the National Planning Policy Framework](#) that has recently been undertaken by the Government. This has consulted on a number of changes of direct relevance to this SPD, such as changes in calculations of supply and delivery of homes, that are likely to

have a material impact on this policy. Consequently, there is a risk that the SPD is adopted, and then superseded by changes in Government policy. We would therefore recommend that the adoption of this SPD be deferred until a review is undertaken of the new NPPF once adopted, and any further changes to the SPD are consulted upon also.

Comments on Policy H1 - Housing Mix

We consider that small sites should comply with the principles of the Strategic Housing Market Assessment and the need identified within that document. There has been a significant development of small sites across Central Bedfordshire for a number of years, and because of the exception from the need to meet strategic housing need, there is a risk that local housing needs are not satisfied through small sites. With large sites being technically challenging to deliver, this places an undue reliance on strategic sites to meet the housing needs in terms of mix of Central Bedfordshire. We therefore recommend that small sites not be exempt from the provision of appropriate mix of housing.

Regarding the Luton & Central Bedfordshire Strategic Housing Market Assessment, this was adopted in December 2017. We would recommend a commitment within the SPD to undertaking a review of this assessment on a regular basis, and update the SPD accordingly. Additionally, we would also recommend that the tabled information detailed in this document be fully incorporated into the SPD.

With regards to paragraph 3.5.2: There is some concern over this paragraph regarding 'viability' and there should be a clear understanding that the costs of analysing any 'viability assessment' should be fully covered by the developer. For example in paragraph 6.14.6 where it states that "All viability assessments will be referred for independent review at the cost of the applicant".

Comments on Policy H2 - Housing Standards

Whilst we welcome the adoption of standards associated with wheelchair adaptable homes, it is our view that the required proportion to meet these standards, specifically M4(3), is relatively low. This is particularly the case in relation to social housing, where it is our view that the percentage of residents likely to need such supported accommodation is likely to be higher in such housing units.

The paragraphs which provide details and guidance on 'Extra care facilities/housing' on larger sites of 300 units or more are welcomed as is the clarification in paragraph 5.9 (Locational requirements) that more than one facility within a single town would be discouraged.

The required proportion of M4(3) wheelchair adaptable homes is still relatively small as detailed in Table 6.

The descriptions and requirements in 5.4.1 (Level access flats) and 5.4.2 (Low density flats) are a little confusing.

Regarding paragraph 5.15.4 it is not clear what outreach services are being provided by the Council's Steppingley Road independent living scheme in Flitwick.

Comments on Policy H3 - Housing for Older People

The focus on the delivery of bungalows is broadly welcomed, as is the removal of age restrictions on such properties. However, we are concerned that the focus of the document on 'age appropriate' accommodation is somewhat restrictive. Whilst those who are elderly are more likely to experience health challenges, so long as homes are adaptable to the needs of a variety of people then a variety of housing types can be used for the needs of the elderly.

Paragraph 6.1.3 clarifies that a 'piecemeal' approach to development is not acceptable to avoid triggering the affordable housing threshold but an enforcement mechanism to identify this would be useful.

Comments on Policy H4 - Affordable Housing

The provision of affordable housing is a particular issue for Flitwick. The issue of affordability manifests itself in different ways in different areas of Central Bedfordshire, as recognised by the SPD itself. The need for affordable housing locally therefore needs to be based on an understanding of local needs of communities and local requirements for the provision of affordable housing. All whilst achieving wider goals related to affordable housing.

Accordingly, as part of the SPD, applicants should be stated that it is expected that applicants exceed the minimum provision for affordable housing supply as part of their developments. We are also concerned about the wording regarding the off-site provision of affordable housing supply in the event that it cannot be provided on site. We would suggest additional text stating that offsite provision must be provided within the local community affected by the impacts of the development, and whose affordable housing supply would otherwise be expected to contribute towards.

For such sums, we also would like to see evidence for the calculation based upon 50% of the open market value. Is this based upon nationally adopted standards or best practice, and how was it otherwise derived? We would recommend that the calculation of such sums is instead based upon the construction price of dwelling types for which the commuted sum is sought, to more accurately reflect the costs of provision.

There is concern that there is much emphasis on the potential for a developer to avoid providing policy compliant affordable housing by the developer deeming it unviable.

We would also recommend making nomination agreements open and accessible to the public.

Comments on Policy H5 - Rural Exception Sites

We have no comments to make regarding Rural Exception Sites.

Comments on Policy H6 - Self-Build and Custom Housing

This section of the SPD needs more careful consideration of, and where applicable integration with, the Design Code SPD that is currently out to public consultation. The DPD as written indicates that self-build properties should be somewhat separate to the main development. We would argue that the principles of good design, as highlighted in the Design Code SPD, necessitates closer integration between self-build housing and the remainder of the development.

There is also a risk, from the interpretation of this section, that self-build homes generally would not consider the design standards as outlined in the Design Code SPD. We would recommend that additional text is added to this section stipulating that any self-build that is brought forward would be expected to identify compliance with the Design Code SPD, and/or local design guidance as applicable.

It is also unclear as to whether the affordable housing requirement also applies to sites that are entirely self-built. In this section of the DPD, we would like to see an additional paragraph clarifying this matter, and it is the view of the PIWG that in instances where sites are majority self-built, then the affordable housing requirement be applied.

Comments on Section 9 - First Homes

We have no comments to make regarding this section of the SPD.

Comments on Section 10 - Community-led Housing

We have no comments to make regarding this section of the SPD.