



WhatHouse? Housebuilder of the Year

**WRITTEN
STATEMENT**

MATTER 2

Forest Heath District
Council

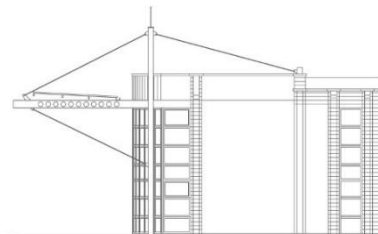
SIR Examination

September 2017

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1.0 This document is intended to provide additional information on which we will rely in the forthcoming Examination of the FHDC SIR.

2.0 In response to:

2.2 c) A 5% uplift has been applied to the OAN to reflect market signals. What is the reason for this?

2.2 d) Why has 5% been selected (rather than a different percentage), and what is the justification for this specific figure?

2.2 f) Overall, has the OAN figure been arrived at on the basis of a robust methodology?

- i. The Peter Brett report recommends a 5% uplift to account for market signals. This position is well below the three examples identified. Both Eastleigh and Uttlesford were cautious approaches with a 10% uplift. The median house price in Eastleigh is £210,000 and the ratio of median house prices to incomes is 7.9%. In Forest Heath the median house price is £202,000 and the ratio of median house prices to incomes is 7.6%. Forest Heath exhibits similar characteristics to Eastleigh where a 10% uplift was agreed as an appropriate response to market signals. Providing just half of that based on a 'judgement' appears to risk a failure to provide sufficient houses to meet need. A 5% uplift therefore does not appear justified, does not appear to have responded appropriately to market signals and does not appear to have been arrived at on the basis of a robust methodology and therefore it should be reviewed.

3.0 In response to:

2.4 c) Will the housing requirement in Policy CS7 ensure that the need for affordable housing will be met? If not, should the housing requirement be increased?

- ii. The plan will not meet affordable housing needs. The plan identifies that to meet the full identified affordable housing needs 2,638 affordable homes are required. The evidence base suggests that 27% of the homes delivered will be affordable housing leaving a shortfall of 802 affordable homes during the plan period. It cannot be right not deliberately plan not to meet affordable housing needs. Proposing a plan which fails to meet identified need is an inappropriate response to market signals, is neither justified nor positively prepared and does not meet a core Government objective for the planning system, particularly paragraph 47 of the NPPF which states that Local Plans must meet the 'full, objectively assessed needs for market and affordable housing'. The effect will be that more people fall into affordable housing need and that there will be more people in need of affordable housing at the end of the plan period than at the beginning.

- iii. Peter Brett's report suggests that meeting affordable housing need is 'unrealistic'. This position is not accepted. It is a Council's duty to assess and plan to meet identified need. Planning for such a shortfall is unacceptable. It is our view that the proposals can only be made sound by planning to meet the identified affordable housing need. This accords with paragraph 145 of the Cambridge Research Group report which states '*if it could help deliver the required number of affordable homes, FHDC should consider an increase in the total housing figures included in the local plan.*'
- iv. Provision should be made for at least 7,600 new homes over the plan period to ensure that housing needs are met.