

## Policy 32

### Id No Respondent

405 Acomb Estate

141 Brethren's Gospel Trusts

428 Campaign To Protect Rural England

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Objection lodged. Following on from the objections to Policies 28, 29 and 30, in our view if problems of affordability are to be addressed, greater housing numbers are required amongst other things.

Para 3.75 and 3.76 - Object to omission of places of worship and burial facilities and from the policy wording itself.

Para 3.77

The RSS must include a regionally agreed definition of affordability in housing stock, which covers the appropriate 'local' scale for assessing house prices, average income etc. Without this, consistent regular reviews of affordable and social housing need cannot be carried out.

CPRE considers that the ratio of house price to total household income is a suitably robust definition.

CPRE supports this policy but believes it can be strengthened:

Amend b)

'ensure housing is served by existing public transport, or by new routes and services if necessary and is accessible...'

(d) More guidance is needed on how affordable housing need can be met within the limits of the housing allocations, especially in rural areas.

The policy could recommend

- the adoption of reduced thresholds for requiring the provision of affordable housing
- preferred legal or interventionist methods of ensuring that housing remains affordable

However, add bullet point (g):

"The use of 'exceptions policies' where affordable or social housing is placed on unallocated or otherwise unmarketable sites should be discouraged and used only as a last resort as it can lead to social isolation and reduce inclusivity."

244 Centrepoint

3.1 Centrepoint is encouraged to see that giving "everyone the opportunity of living in a decent and affordable home" is included within the criteria for sustainable development you recommend for use in the Local Development Frameworks. Our previous research in County Durham has highlighted the importance of the Local Development Frameworks being developed alongside their affordability policies.

3.2 There are concerns however that the Regional Spatial Strategy does not give enough guidance on what is an affordable house. Our research in the ex-coalfield communities of Easington and Derwentside highlights that what is affordable for a key worker is likely to be significantly different from that affordable for a young person with insecure earnings or on benefits.

3.5 Centrepoint is committed to a definition of affordability which is broader than a purely statistical calculation. We believe that the regional spatial strategy should at least make some reference to the complexity of this debate

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282 City of Durham Trust

On the question of local affordability, note that strategy (d) of the policy and its associated para 3.79 omit mention of Durham City. Durham has a significant problem stemming not from holiday homes, but from the use of many houses in city streets being occupied by students following so-called entrepreneurs purchasing terraced houses and converting them for letting. The Trust has urged the Authority to adopt appropriate, restrictive policies, while a large collegiate University in a small town should be "encouraged" to provide more "live-in" accommodation.

2 Clark Homes

Policy 32 of the RSS requires the local planning authority to address the need for a high provision of affordable housing in the Borough. Demand for affordable housing in the Berwick area has been high in recent years. The proportion of rented housing in the Borough has been historically high but this is gradually becoming less available. The Borough Council's Housing Strategy Statement 2003 – 2006 forecast around an additional 600 additional households requiring accommodation in the Borough. It is understood that a new Housing Needs Assessment for the Borough is due in May of this year. Recent Housing Association developments in the Borough account for most of the annual average dwelling provision proposed in the draft RSS for the Borough.

**Impact on the conurbations**

Berwick-upon-Tweed is not in the commuter belt for the Tyneside conurbation. A modest increase in the total allocation will have little impact, if any, on housing market restructuring in the Tyneside conurbation and the South East Northumberland former coalfield areas.

**Scottish hinterland**

Berwick upon Tweed serves parts of the Borders Region of Scotland in respect of retail and employment opportunities. A proportion of its housing market is directly related to this role. This is not accounted for in the RSS figures as they relate solely to England.

**Strategic Planning**

The proposed housing allocation spread over a large rural area with a number of service villages actually prevents effective strategic planning decisions being made by the Local Planning Authority, by making allocations in one centre which will be sufficient to make a difference, the LPA will be unable to make appropriate allocations in others because of the overall limits of the limited allocation for the whole district.

The population levels required to support a local facility such as a shop, post office, doctor's surgery are increasing steadily, and at a time when such key services are under threat in many rural areas a reduction in the capacity of the Planning authority to focus development on key settlements and safeguard these services is entirely contrary to the objectives which

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under pin the Rural White Paper and PPS 7.

- 163 Friends of the Earth North East Friends of the Earth supports this policy. Point b) should be amended to read, 'well served by public transport', so that a minimum level of service provision is not deemed acceptable. It should also identify criteria to ensure that housing development is only undertaken or favoured in locations with adequate walking, cycling and public transport accessibility.
- Policy d) is not sufficiently specific and should recommend that LDFs adopt a target for the provision of affordable housing in their district (developed through local housing needs assessments), and a specific threshold for requiring the provision of affordable housing.
- The following should be added as outcomes: '100% of LDFs to include policies to address social exclusion through improved public transport provision' and '100% of LDFs to include policies to ensure that new housing is well-served by public transport, walking and cycling from the outset
- 215 Government Office For The North East Circular 1/94 to be replaced by a new Circular 'Planning for Gypsy and Traveller Sites' in October which will provide guidance on the need for more prescriptive policies within RSS using local needs assessments to set a framework for meeting site/pitch requirements at a district level.
- Paras 3.79 3.81 and Policy 32 This presents a rather simplistic assessment and understanding of the problems of affordability in both urban and rural areas.
- Policy 32 implies that rural affordability problems are concentrated in Northumberland whereas the text of the plan and indicates otherwise. There are significant areas of West Durham that also experience pockets of affordability problems.
- This policy should address the issue of fuel poverty by ensuring that high levels of energy efficiency are incorporated in new developments, refurbishment and the existing housing stock.
- 195 Grainger Trust This policy is supported with the requirement and specific reference for an assessment of local housing need. This will ensure that appropriate levels of affordable housing are provided across the region
- 164 Hallam Land Management Ltd Affordability is a direct result of supply and demand. The suppression of development of housing in rural areas will inevitably restrict supply, demand will remain high and rural properties will become more unaffordable to local people. Whilst understanding the overall aims of the RSS to concentrate development in and around the urban areas this is likely to compound the issue of affordability in rural areas.
- 160 Highways Agency Ensure a range of dwelling types and ensure that it is served by public transport and accessible to jobs, services and faculties by modes other than the car. Also ensure provision of affordable housing in certain areas
- 424 Home Builders Federation We note in paragraphs 3.77, 3.78 references to the continued and increasing problems associated with affordability and in paragraph 3.79 specific reference is made to the impact on housing availability created by the second homes market. Again, relating this back to the distribution of new homes in Policy 30, we consider the drive to provide a significantly higher proportion of new homes in the urban core will in fact exacerbate issues of affordability in rural areas.
- Whilst Policy 32 is to be broadly supported, this RSS housing distribution is more likely to add to the increasing problems in rural areas.

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549	Member of Public	Support but point b) amend to read " well served by public transport" so that a minimum level of service is not deemed acceptable
471	Member of Public	I particularly agree that strategies, plans and programmes should ensure housing is served by public transport and is accessible to jobs, services and facilities by modes other than the car. This will have economic, social and environmental benefits.
453	Member of Public	Dwelling size is an issue. There to many 3-4 bedroom executive homes being constructed. More 1-2 bedroom affordable housing is needed for people who live and work locally
273	Member of Public	Point b) should be amended to read : "well served by public transport" so a minimum level of service provision is not deemed acceptable  The inclusivity one is fine as far it goes but with affordability I struggle to know what that actually means in money terms in each area as the markets are all different. As the public sector has managed to remove itself from providing what I would call social housing. With only the RSL's and the private sector dealing in this it is a bit rich to seek to ask the developer to deal with the whole problem as the folks who pay their costs, i.e. are you and I alone. It also seems very politically correct to highlight travelling communities but the existing population should come first if we live in democratic society. Your priorities in the policy need reworking. In addition to the affordability issue the prime cause for population shift is lack of infrastructure. Unless this is addressed all the inclusion agendas will never touch the problem. I note the comment re lapsed planning consents and this too has been the subject of announcement by the ODPM. Presumably all these ODPM thoughts will filter through to the RSS when it finally emerges from the battle field.
449	National Trust North East	The Trust supports this policy, and in particular part d), which goes some way towards addressing the very real problem of lack of affordable housing in tourist areas where second homes constitute a high percentage of housing stock. The policy could go further, by asking LPAs to assess "hot spots" where second homes are a particular problem, and then ensure that only affordable housing is provided in those areas.  The Trust therefore request that an extra section is added to the policy to read (after d))  e) Where affordability problems are associated with a high percentage of second homes, LPAs should ensure that only affordable housing is provided in these areas.
222	Northumberland County Council	Whilst the RSS acknowledges in paragraph 3.81 the possibility of an allowance for second and holiday homes in addition to the housing allocation in certain areas this is not specifically supported through Policy 32.
47	Northumberland Estates	Should include provision for the circumstances set out in the preceding para 3.81 with  (g) Rural LDF's should discount provision for affordable housing against allocations in policy 30 in order to balance against homes lost to second/holiday homes.
136	Northumberland National Park	The policy seeks to ensure a high provision of affordable housing in Alnwick, Berwick-upon-Tweed and Tynedale districts, which the Regional Housing Strategy recognises experience particular problems relating to high demand for properties including second homes. This is supported, but it is unclear how this could be achieved effectively due to the factors relating to reducing housing supply in rural areas post 2015. The policy should also apply specifically to the Northumberland National Park.
338	Northumberland Tyne & Wear NHS	Statement C welcomed. However, health services need to be considered when there is any change in housing provision.
151	Sunderland ARC	Improving Inclusivity is supported.

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43    Teesdale District Council

TDC object to Policies 8 and 32 as they fail to acknowledge the scale of the problems of affordability facing the District. In recognition of the priorities of the Regional Housing Board and strong evidence at the local level, Teesdale should be included in the Regional Spatial Strategy as the fourth District in the Region where affordability is a highly significant and increasing problem.

105    Tynedale Council

Paragraph 3.79 and Policy 32 (d) The references to Tynedale in relation to a high level of affordable housing need are to be welcomed. However, paragraph 3.79 refers to a number of local authority areas in the north-east where there is an affordability issue with no indication of whether this is exhaustive or their prioritisation, as compared with Alnwick, Berwick and Tynedale. This reflects the continued lack of a proper regional spatial strategy on the distribution of affordable housing needs and provision, based upon housing needs and/or housing market areas. In relation to this it should be noted that the Regional Housing Strategy (launched in July this year) specifically identifies Tynedale as one of just four priority rural areas for affordable housing.