By email only: localplanconsultation@southnorthants.gov.uk

Dear Sirs

RE: SOUTH NORTHAMPTONSHIRE LOCAL PLAN PART 2: SUBMISSION DRAFT

We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent-save-own model. This is achieved through a combination of a secure affordable rented period (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years.

All Rentplus dwellings are leased to Registered Providers at an affordable rent for up to 20 years – the RP manages and maintains each property, giving tenants the assurance of renting through a responsible housing provider. This builds resilience into local communities; each Rentplus development is sold on a phased basis every 5 years – those homes not sold at year 5 are re-let to tenants for a further 5 years.

This form of tenure and development enables partner Housing Associations to diversify local housing stock and for local households to find the right type of home for them. Rentplus developments delivered in partnership across England with housing associations have already delivered significant benefits to those people who could not previously access housing that was affordable to them. Case studies are set out on the Rentplus website (accessible via http://www.rentplus-uk.com/about/case-studies), highlighting the difference that a broad mix of affordable housing can make to communities – and that the delivery of rent to buy can make to people who could not access social or affordable rent, or shared ownership previously, or were able to move on and free up those homes for others in greater need.

We previously responded to the consultations in 2016 and November 2017 on affordable housing, seeking a local review of the delivery of a wider array of affordable housing tenures to meet local needs. Since the last consultation closing in November 2017 the Government has published a revised NPPF (and further consultation document on assessing housing need), with many changes within this relating to how developers and LPAs working in partnership can deliver a much greater supply of housing, and in particular of affordable housing. We are pleased to see that the Council has updated the plan in light of the NPPF2 being published.

Given the scale of change in national policy and the scale of the challenge in meeting affordable housing needs across the country and in South Northamptonshire more specifically, it is important for the Council to consider how its policies will be used in determining planning applications in the longer term, and to modify this prior to examination where this will assist with its effectiveness over the long term.

The significant unmet need for affordable housing across South Northamptonshire is well recognised by the Council and highlighted in both the Part 1 and Part 2 Plans which is supported. Affordability is constraining access to home ownership, keeping many potential home owners locked in private rented accommodation or in other affordable tenures without support towards ownership. Access to a deposit remains one of the most challenging blockers to accessing home ownership which can only be resolved through a significant step change in delivery of all tenures, and in ensuring a supply of tenures that specifically address the inability of households to save for a deposit.
We are pleased to see that the definition of affordable housing within the Glossary includes rent to buy as per the NPPF2 (2018) definition. We are also pleased to see the Council’s inclusion of a policy on entry-level exception sites as this will also assist in delivering a step change in supply of affordable housing across the District.

**Policy LH8: Affordable Housing** includes at **point 3** the proposed tenure split for the District. The inclusion at point 3b requires 10% of the 25% delivery of ‘other affordable routes to home ownership’ to be available for discounted market sales housing. This is not in accordance with the NPPF which at paragraph 64 (and footnote 29) states:

> Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership29, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. 29 As part of the overall affordable housing contribution from the site.

The NPPF is clear that the 10% is to be calculated **against the whole development proposal** and not the 25% which in this policy is other affordable routes to home ownership. The wording of the policy is a very different proposal that would not meet the Government’s aspiration for a step change in the delivery of affordable home ownership options. The wording of this policy therefore requires clarification to ensure it is consistent with national policy and effective over the long term. We recommend the below amendments which also seeks to better reflect the new affordable housing tenures in the NPPF and how these should most effectively be brought forward by the Council:

3 The council will seek to provide 10% of the homes as affordable home ownership, with for the following tenure split applied, incorporating that 10% as part of the overall contribution:
   a. 75% **social/affordable** rented provision
   b. 25% affordable housing for sale *other affordable routes to home ownership of which 10% of the homes to be available for discounted market sales housing*.

The above changes will ensure that the policy can be found sound at examination by ensuring it can be used effectively by applicants and decision-makers alike once adopted; without the above changes there is a clear danger that the policy becomes immediately outdated the day after adoption, failing to enable clear decision making at land appraisal through to determination of individual applications. The changes will also properly allow reflection of the new definition of affordable housing, whilst allowing it to be tested against the 2012 NPPF and abiding by the transitional arrangements, as we have discussed at several examinations in the months following the publication of the revised Framework.

We would like to be notified when the Local Plan is submitted for Examination, and request attendance at the hearings session covering **Policy LH8**. Please notify **Tetlow King Planning** as agents of **Rentplus** by email only to consultation@tetlow-king.co.uk.

Yours faithfully

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PRINCIPAL PLANNER
For and On Behalf Of
TETLOW KING PLANNING