



# Whittlesey Town Council Housing Needs Assessment

July 2017

## FINAL DRAFT REPORT

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## Glossary of terms used in the text:

AH	Affordable Housing (NPPF definition)
AMH	Affordable Market Housing
DCLG	Department for Communities and Local Government
EER13	Employment Evidence Report 2013
FDC	Fenland District Council
FEDS12	Fenland Economic Development Strategy 2012-2031
AFLP14	Adopted Fenland Local Plan 2014
HNA	Housing Needs Assessment
LEPSEP14	Greater Cambridge Greater Peterborough Local Economic Partnership Strategic Economic Plan 2014
LPA	Local Planning Authority [The local authority]
NDP	Neighbourhood Development Plan
NP	Neighbourhood Plan
NPA	Neighbourhood Plan Area
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PRS	Private Rented Sector
RTF	Rural Town and Fringe
SHLAA	Strategic Housing Land Availability Assessment
SHMA13	2013 Strategic Housing Market Assessment for the Cambridge Housing sub-region
WTC	Whittlesey Town Council

# 1. Executive Summary

## 1.1 Introduction

1. The 2011 Localism Act introduced neighbourhood planning, allowing parishes, town councils or neighbourhood forums across England to develop and adopt legally binding development plans for their neighbourhood area.
2. As more and more parishes, towns and forums seek to address housing growth, including tenure and type of new housing, it has become evident that developing policies need to be underpinned by robust, objectively assessed housing data.
3. In the words of the National Planning Practice Guidance (PPG), establishing future need for housing is not an exact science, and no single approach will provide a definitive answer. The process involves making balanced judgments, as well as gathering numbers and facts. At a neighbourhood planning level, one important consideration is determining the extent to which the neighbourhood conforms with trends in the wider Housing Market Area (HMA) but also diverges from them, to reveal its own particular characteristics. This approach reflects the fact that a single town or neighbourhood almost never constitutes a housing market on its own and must therefore be assessed in its wider context.
4. The guidance quoted above on housing needs assessment is primarily aimed at local planning authorities preparing Strategic Housing Market Assessments (SHMAs), which are used to determine housing need at a local authority level. However, it helpfully states that those preparing neighbourhood development plans (NDPs) can use the guidance to identify specific local needs that may be relevant to a neighbourhood, but that any assessment at such a local level should be proportionate.
5. Our brief was to advise on data at this more local level to help Whittlesey Town Council (WTC) understand, among other matters, the type, tenure and quantity of housing needed to inform neighbourhood plan policies.

## 1.2 Summary of Methodology

6. Housing Needs Assessment (HNA) at neighbourhood plan level can be focused either on quantity of housing needed, type of housing need, or both. In most cases, there is a need to focus on quantity where the housing target for the settlement being assessed is unclear, for example where the local authority has not set a specific target for the settlement, or where there is no local plan in place.
7. In the case of Whittlesey, the Adopted Fenland Local Plan 2014 (AFLP14) sets out a minimum of 1000 dwellings to be delivered over the Plan Period to 2031. However, this target has been rendered obsolete on account of it having been exceeded by a substantial margin as a result of development over the last 5 years; moreover, the policy is expressed as a minimum requirement, and is therefore ineffective in defining housing need for the town.
8. The purpose of this HNA is therefore in part to ascertain an appropriate number of dwellings at Parish level by providing alternative projections drawn from a range of plausible sources.
9. A key point of reference is the principal evidence base for the LPA's housing policies, the 2013 Strategic Housing Market Assessment for the Cambridge Housing sub-region (SHMA, 2013).
10. The rationale for this approach is that neighbourhood plans need to pass a number of Basic Conditions to be 'made' by the LPA. One of these, Basic Condition E, requires the Neighbourhood Plan to be in 'general conformity with the strategic policies' of the Local Plan, in this case the AFLP14. The Government's Planning Practice Guidance indicates that the level of housing development is likely to count as a strategic policy.<sup>1</sup>
11. In terms of the types of housing needed, there is generally more flexibility on what neighbourhood plans can cover. In order to understand the types of housing needed in Whittlesey, we have gathered a wide range of local evidence and summarised it into policy recommendations designed to inform decisions on housing characteristics.

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<sup>1</sup> See Planning Practice Guidance Paragraph: 006 Reference ID: 2a-006-20140306



- 12. Data and materials gathered relevant to this HNA have been sourced and analysed in line with PPG;<sup>2</sup> together, they provide a balance of sources that capture a local perspective.
- 13. The housing projections set out in this HNA correspond with the Neighbourhood Plan period of 2017-2031; this in turn corresponds with the Plan Period for the AFLP14.

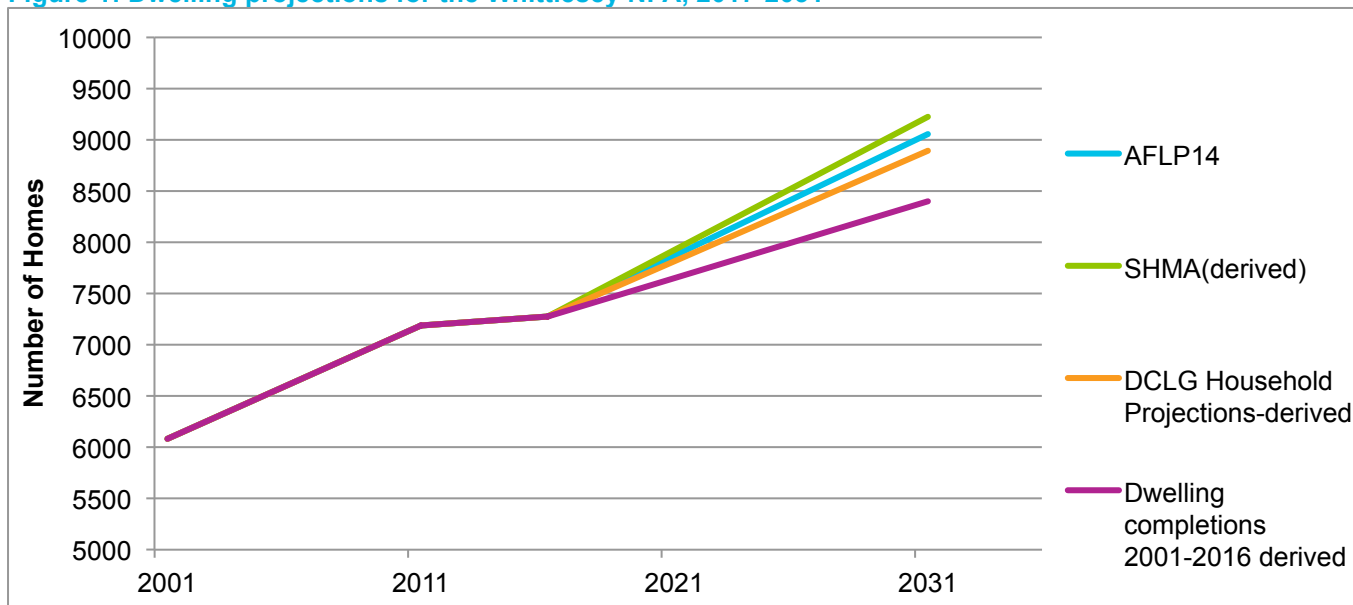
### 1.3 Focus On Demand Rather Than Supply

- 14. Our approach is to provide advice on the housing required based on need and/or demand rather than supply. This is in line with the PPG, which states that *'the assessment of development needs should be an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints.'*
- 15. For this reason, we advise that the conclusions of this report should next be assessed against supply-side considerations (including, for example, factors such as transport infrastructure, landscape constraints, flood risk and so on) as a separate and follow-on study .

### 1.4 Quantity of Housing Needed

- 16. Our assessment of a wide range of data sources identified five separate projections of dwelling numbers for Whittlesey NPA between 2017 and 2031 based on:
  - 1. Adopted Fenland Local Plan (AFLP14) 2011-2031 generates a projection of **1,778 dwellings (1870-92) between 2017 and 2031 or 127 homes per year (rounded)**
  - 2. SHMA derived figure based on a proportional share drawn from OAN which generates a projection of **1,948 dwellings over the plan period, or 139 per year (rounded).**
  - 3. DCLG Household projections which generates a **re-based household projections-derived figure of 1,618, or 116 dwellings (rounded) over the plan period.**
  - 4. A projection derived from homes growth between 2001 and 2016 of **1,120 homes over the plan period of 2017-2031.**

Figure 1: Dwelling projections for the Whittlesey NPA, 2017-2031

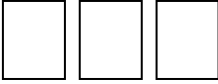
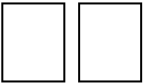
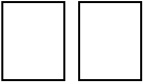



Source: AECOM Calculations

<sup>2</sup> See Planning Practice Guidance Paragraphs: 014 Reference ID: 2a-014-20140306 and 009 Reference ID: 2a-009-20140306

17. The graph above sets out the total number of homes factoring in each of the projections we have identified in Whittlesey. So, for example, factoring in DCLG derived data (orange line) to the number of dwellings that have already been built in the NPA between 2011 and 1st January 2016 (92) produces a total demand for 8,896 homes over the Plan Period.
18. The starting point to arrive at an overall projection for housing numbers to be delivered in the NPA over the Plan Period is the average of the four projections set out above; we depart from this approach if we have reason to believe a given projection should be awarded more weight than others, or should be excluded. For example, if the Local Plan was out of date in planning terms, or another was a clear outlier.
19. In the case of Whittlesey, we do not see any justification for awarding any one projection greater weight, therefore the initial housing projection for the town is 1616 dwellings, or 115 dwellings per annum over the plan period.
20. Moreover, a further assessment applied to this initial projection indicates that market signals (for example the economic context in which the NPA sits, together with the performance of the housing market) are likely to impact on it. We have applied our professional judgment on the scales of increase and decrease associated with each factor on a scale from one to three, where one arrow indicates 'some impact', two arrows 'stronger impact' and three arrows indicates an even stronger impact. Factors are set out in the table below in alphabetical but no other order.

**Table 1: Summary of factors specific to Whittlesey with a potential impact on neighbourhood plan housing**

Factor	Source(s) (detailed in Chapter 5)	Possible impact on future housing need	Rationale for judgement
<b>Employment trends</b>	LEPSEP14, FLP14, SHMA13, FEDS12, Census 2001/11		The wider economic area has been shown to have numerous internationally competitive and nationally significant industries, with a high potential for growth. Furthermore, the growth of nearby Peterborough and Cambridge has been shown to have a likely impact on Whittlesey in terms of demand for housing, as is potential growth in key mature and emerging clusters within the district. Therefore three up arrows has been deemed appropriate.
<b>Housing transactions (Prices)</b>	PPG, FEDS12, Land Registry Price Paid Data for 2007-2016, SHMA13		The Whittlesey NPA has been shown to have experienced a 10% increase in price paid for properties of all types over a ten year period. The price paid varies per housing typology but has been relatively stable across all types, except for flats, for which prices dropped, although this was not seen as significant. Although price growth in Whittlesey was less than in the district as a whole, this was from a higher base, and therefore, two up arrows has been deemed appropriate.
<b>Housing Transactions (Volume)</b>	Land Registry Price Paid Data for 2007-2016, Census 2001/2011 data, SHMA13		The level of housing typologies sold in the Whittlesey NPA generally matches the level in the existing stock, except for flats and terraces. It is suggested that an increased demand in both the NPA and the district for terraced housing relative to supply, versus a decreased demand for detached houses, is indicative of a lack of affordable housing options, and thus that two up arrows is appropriate.
<b>Migration</b>	Census data 2001, 2011		Migration is not seen as significant factor in determining housing need given that the just 1/3rd of the 4.2% of Whittlesey residents born outside of the UK arrived in the last 10 years.

**Overcrowding and concealment**

Census Data 2001, 2011



Although there is some evidence of overcrowding and concealed families in Whittlesey, these are not deemed particularly significant given the levels seen in Fenland district as a whole.

**Rate of development**

FDC, SHMA



The local authorities in the Greater Cambridge Market Area have significantly under-delivered against HMA targets over the past five years. Furthermore the rate of development in Whittlesey is highly granular, fluctuating significantly year to year. Therefore it is reasonable to suggest that the rate of development indicates the potential for future under delivery, and as such two up arrows are deemed appropriate.

21. Our reading of the economic data suggests Whittlesey has the potential to perform a strategic function at the sub-regional level helping to facilitate the economic development of the Peterborough Local Housing Market Area as well as the wider Cambridge sub-region, despite its relative distance from the city of Cambridge itself. It is able to do this both by pursuing its own economic growth strategy as well as providing housing.
22. This is an expression not only of the importance of the city of Cambridge but also the proposed infrastructure improvements that may shrink the sub-region from the perspective of commuting times.
23. Whittlesey's role as a place suited to accommodate not only its own housing needs but also that of the wider sub-region justifies an upward nudge of the housing numbers in the town to ensure it is able to absorb the increased demand from people seeking affordable housing of all sizes close to places of work, while avoiding a precipitous increase in house prices in years to come.
24. While the demand for affordable housing, as captured in the Housing Waiting List data is modest, this does not negate the fact that a very substantial portion of the population are unable to access market housing without some form of subsidy.
25. Those who are ineligible for affordable housing will rely on private rented dwellings that may not be suitable for their needs (while there is no evidence to suggest wide-spread over-crowding, the condition and location of dwellings may not be ideal). For this reason, house prices increases should be dampened through an increased supply, in line with PPG.
26. Taking these factors into consideration, and the overall balance of arrows (9 'up' arrows to 0 'down' arrows), **we feel an overall target of between 1725 and 1775 dwellings to be delivered over the Plan Period would be appropriate in the NPA.**

**Table 2: Summary of local factors specific to Whittlesey with a potential impact on neighbourhood plan housing characteristics**

Factor	Source(s) (see Chapter 4)	Possible impact on housing needed	Conclusion
<b>Affordable Housing (AH)</b>	SHMA13, Housing Waiting List data	<p>People's ability to access market housing has worsened significantly in recent years, with the Lower Quartile Affordability Ratio<sup>3</sup> reaching 8.21 in February 2013 in Fenland.</p> <p>A household income of roughly £36,000 would be required to buy homes valued around the median.</p> <p>A household income of £25,000 would be required to access a three-bedroom 'entry-level' property.</p> <p>There are 48 households on the Housing Waiting List with a local connection, or 3% of the average of the housing needs projections set out in this study.</p>	<p>Given that £25,000 is the median income for Fenland (as of 2012), it is reasonable to conclude that roughly 50% of households are able to access affordable market housing for sale (AMH), with the remainder requiring subsidy to access suitable housing.</p> <p>The relationship between house prices and household income suggests forms of discounted market sale housing (such as 'starter homes') would be appropriate in addressing housing need.</p> <p>Given current adopted affordable housing policy that seeks 20% of dwellings to be affordable housing on sites of 5-9 dwellings and 25% of the dwellings on sites of 10 or more dwellings, this will be enough to satisfy demand emanating from those with a local connection with the NPA based on Housing Waiting List data.</p> <p>It should be noted that while Housing Waiting List data suggests a modest demand for AH, this is constrained very significantly by the Waiting List eligibility criteria. Changes to both the definition of AH, and these criteria will make a difference to the apparent demand in future years.</p> <p>There is no requirement for the Whittlesey neighbourhood plan to set its own affordable housing policy for developments of more than five dwellings, as well as ensuring a robust approach is adopted to securing affordable housing on sites.</p>
<b>Demand/ need for smaller dwellings</b>	SHMA13, Housing Transactions data (Land Registry)	<p>One person households will make up the majority of household increases from 2011 to 2031, and the majority of these are likely to be older residents.</p> <p>There is an increased demand for terraced housing relative to supply, versus a decreased demand for detached houses.</p>	<p>There will be an under-supply of smaller dwellings, those sized 2 and 3 rooms, unless their representation within the overall housing stock is increased.</p> <p>Housing transactions data reveals a demand for terraced housing that is stronger than for other house-types, justifying a similar realignment of the housing stock as for smaller dwellings.</p>
<b>Demographic Change</b>	Census, SHMA 13	Based on age structure data, Whittlesey is a place with a strong orientation	An important opportunity exists for the Neighbourhood Plan to develop policy around

<sup>3</sup> An accepted measure of affordability expressed as house-prices as a multiple of household income.

towards family life, as well as a place of retirement. the needs of older residents.

In the future, this profile is likely to continue, although with an increasing shift towards an older demographic as current family households mature into those of older couples and singles as their children set up households of their own, many of whom will do so outside the area.

<b>Family-sized housing</b>	Census, SHMA13	Property is relatively affordable for those on incomes around the median and mean, registering an Affordability Ratio of 5.26 and 4.68 respectively.	Households on mean incomes are benefitting from property values well below the average for the sub-region. For those on modest incomes, this makes Whittlesey and attractive place to set up home, reinforcing its strength and established identity as a family-orientated environment.
		The neighbourhood will remain a place with a strong family presence, reflecting the area’s continued appeal as a place to bring up children and its established identity as a family-orientated environment.	Market housing, both affordable (AMH) and more expensive properties will be in demand in future years; for this reason, there should be a mix of dwellings types and sizes to underpin the continued role of the NPA as a good place to bring up children, suggesting dwellings of 5 rooms+.
		The data assembled suggests families with children is a household type that is forecast to grow, albeit modestly, in the future.	

<b>Tenure of housing</b>	Census	Census data shows the majority of dwellings are in owner-occupation.	In terms of tenure, the main beneficiary of social housing will be young families and solo/couple pensioner households on median incomes and below. These groups are forecast to grow over the Plan Period, providing a strong rationale for a sizable component of social housing within AH secured as a result of development.
		There has been a decline in the stock of Affordable Homes (and limited availability of forms of intermediate types of AH in particular).	For those ineligible for AH and unable to access AMH for-sale, PRS dwellings will be attractive, underpinning its growth; for this reason policy should support build-to-let development.
		The town has seen a growth in Private Rented Dwellings; this tenure type provides a way of accessing housing for those unable to afford market housing.	As seen, roughly 50% of households are able to afford market housing, justifying its inclusion within the tenure mix in future years.

### Recommendations for next steps

27. This neighbourhood plan housing needs advice has aimed to provide WTC with evidence on housing trends from a range of sources. We recommend that the Town Council should, as a next step, discuss the contents and conclusions with FDC with a view to agreeing and formulating draft housing policies, in particular the appropriate approach to identifying the level of need for new housing in the NP area, bearing the following in mind:
  - Neighbourhood Planning Basic Condition E, which is the need for the neighbourhood plan to be in general conformity with AFLP14
  - the views of FDC – in particular in relation to the housing need figure that should be adopted;
  - the views of local residents, as captured in household surveys;
  - the views of other relevant local stakeholders, including housing developers;
  - the numerous supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any capacity work carried out by the FDC, including but not limited to the SHLAA; and
  - the recommendations and findings of this study.
28. Recent changes to the planning system, forthcoming changes to the NPPF, as well as the implementation of the Housing and Planning Act, will continue to affect housing policies at a local authority and, by extension, a neighbourhood level.
29. This advice note has been provided in good faith by AECOM consultants on the basis of housing data and national guidance current at the time of writing (alongside other relevant and available information).
30. Bearing this in mind, we recommend that the steering group should monitor carefully strategies and documents with an impact on housing policy produced by the District Council or any other relevant body and review the neighbourhood plan accordingly to ensure that general conformity is maintained.
31. At the same time, monitoring ongoing demographic or other trends in the factors summarised in Tables 1 and 2 would be particularly valuable.

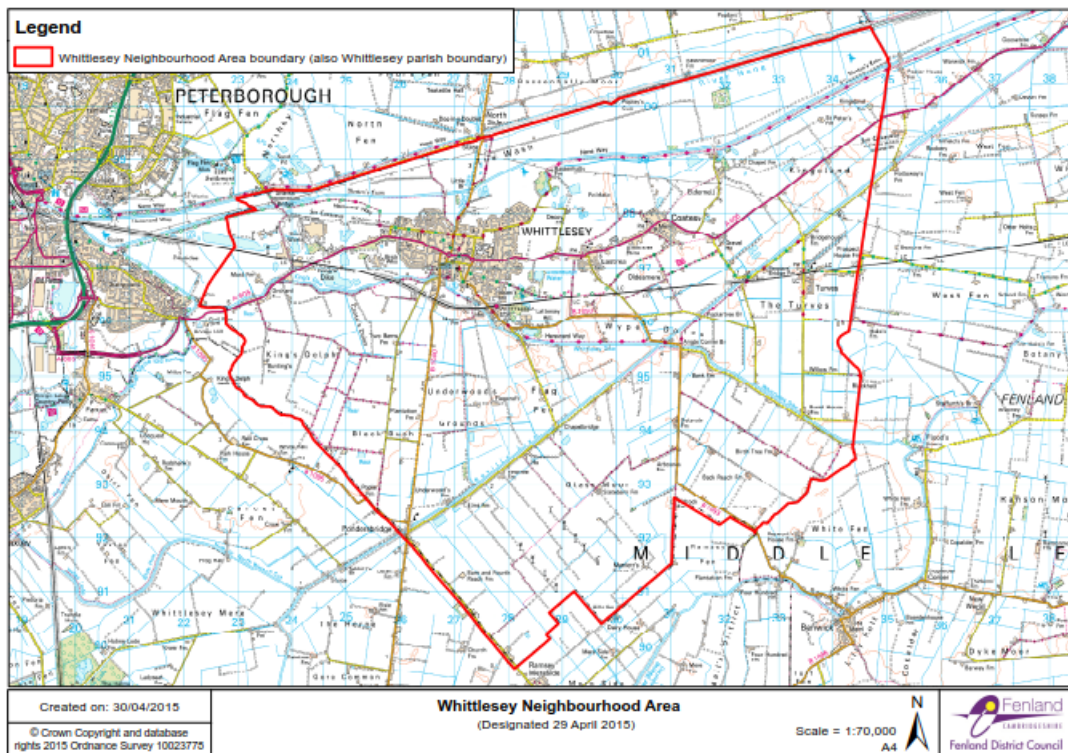


## 2. Context

### 2.1 Local context

32. Whittlesey is a large market town sitting within the Fenland district of Cambridgeshire, situated 6 miles from Peterborough, and approximately one hour by train or car to Cambridge itself. Bordered by the River Nene to the north and King's Dyke and Briggate River to the south, the town is centred on a large market square, with the A605 running east-west to the north.
33. The neighbourhood plan area also encompasses the smaller settlements of Eastrea, Coates, Turves (to the east of the town) and Pondersbridge to the south.

Figure 2: Whittlesey Neighbourhood Plan Area

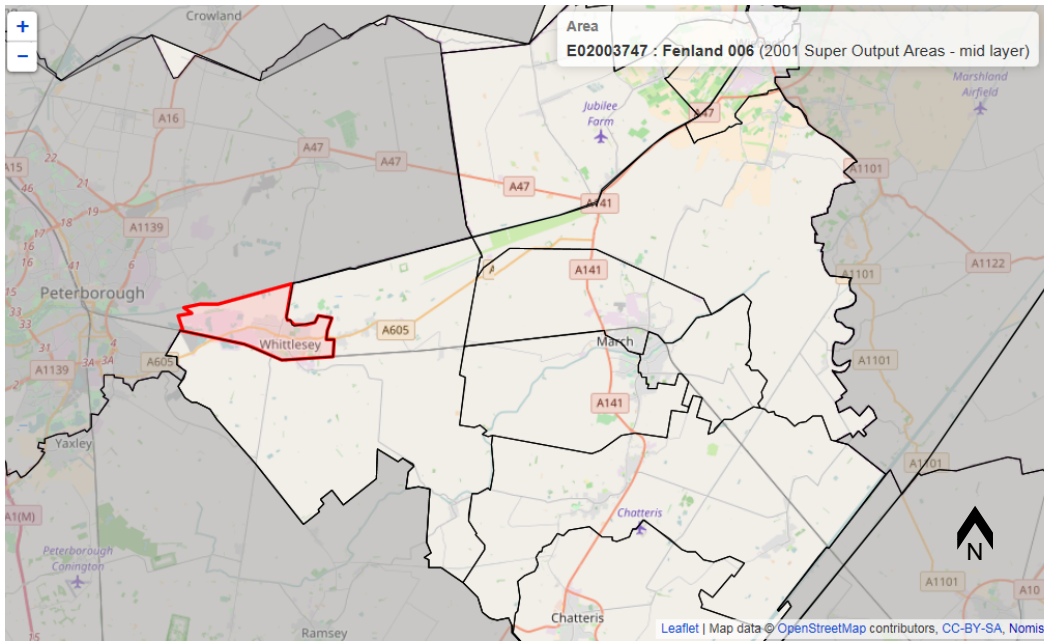


Source: WTC

### 2.2 Census Geography

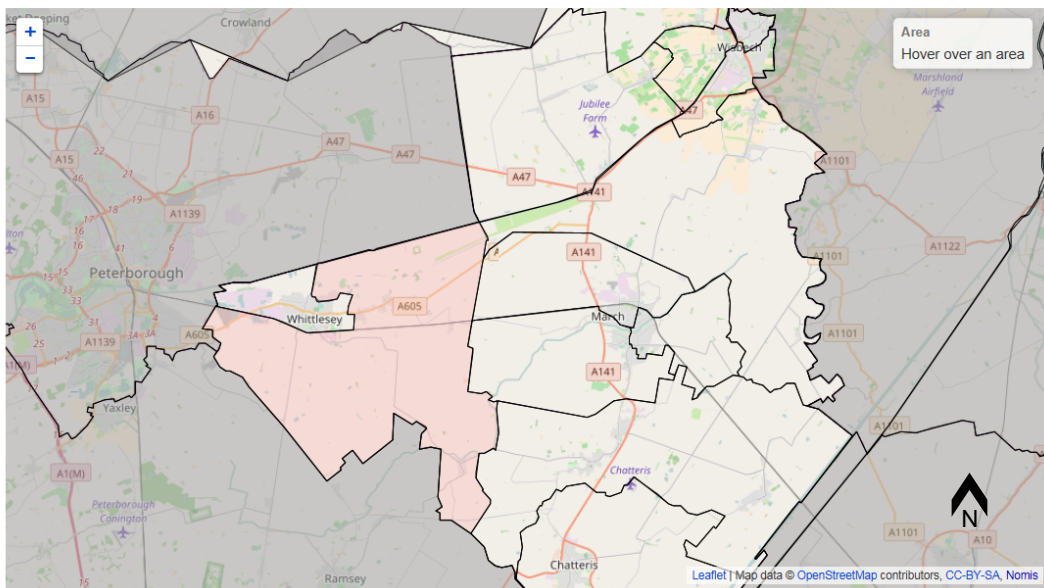
34. For the purposes of this study, census data was downloaded from both the 2001 and 2011 Censuses to contribute to an assessment of the housing needs in the area. Whilst the 2011 Census data can be filtered down to the Parish level, thereby ensuring exact accuracy, 2001 Census data is grouped according to a series of other geographical areas or units rather than parishes, which are known as Output Areas (OAs), Lower Layer Super Output Areas (LSOAs), and Medium Layer Super Output Areas (MSOAs). As such, to find the appropriate 2001 Census data for the entire parish, a combination of these needs to be used. In the case of Whittlesey, this requires one MSOA, three LSOAs, and two OAs.
35. Figure 3 below shows that, whilst the MSOA named Fenland 006 corresponds correctly with the centre of Whittlesey, the MSOA Fenland 008 shown in Figure 4 below does not correctly correspond with the boundary of Whittlesey Parish. Therefore, a different set of geographies must be used.

Figure 3: Matching 2001 Census Mid Layer Super Output Areas for Whittlesey centre (Fenland 006)



Source: <http://www.nomisweb.co.uk/>

Figure 4: Non-matching 2001 Census Mid Layer Super Output Areas for Whittlesey outskirts (Fenland 008)

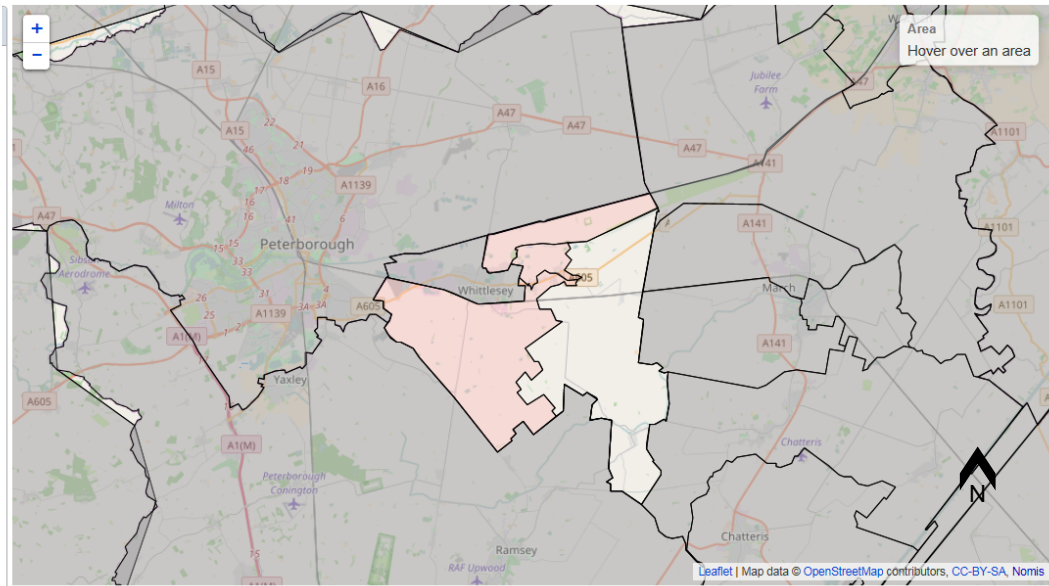


Source: <http://www.nomisweb.co.uk/>

36. Therefore, Figure 5 below shows three LSOAs which help to make up the correct geography for the parish, whilst Figure 6 below demonstrates the two further OAs used to make up the 2011 parish geography, 12UDGD0013 and 12UDGD0007.

**Figure 5: Additional 2001 Census Lower Layer Super Output Areas for Whittlesey outskirts**

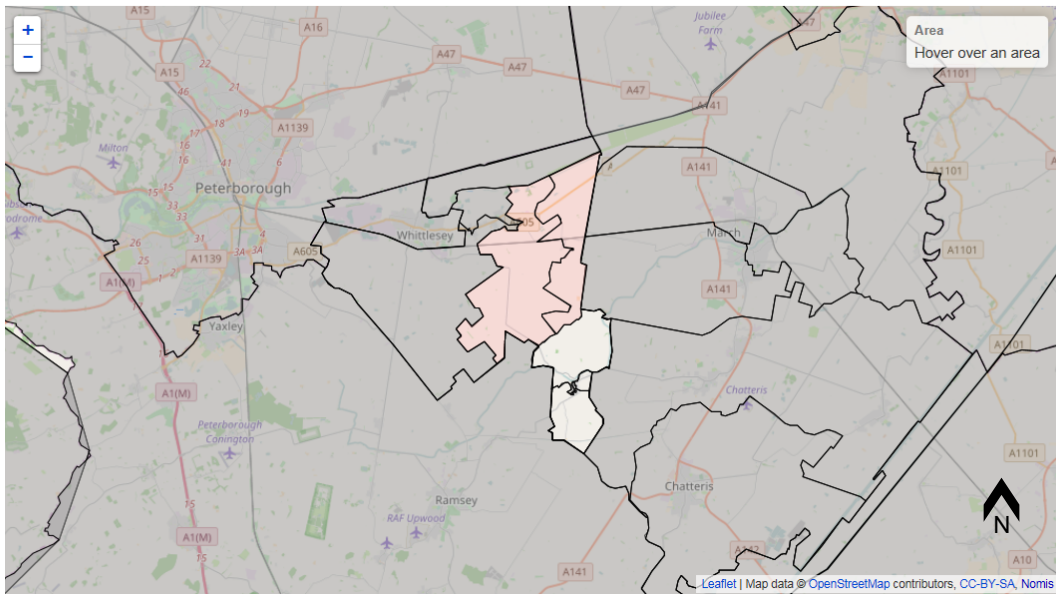
Fenland 008



Source: <http://www.nomisweb.co.uk/>

**Figure 6: Additional 2001 Census Output Areas for Whittlesey outskirts**

Fenland 008 > E01018060



Source: <http://www.nomisweb.co.uk/>

### 2.3 Local Planning context

37. In line with the basic conditions of Neighbourhood Planning, Neighbourhood Development Plans (NDPs) are required to be in general conformity with adopted strategic local policies. Consequently, there is a requirement for the relevant Local Plan to be reviewed as part of this HNA. The Fenland Local Plan, adopted May 2014, is the most up to date local plan for the area and so has been reviewed for policies relevant to housing need. Furthermore, no drafts of the emerging Fenland Local Plan have yet been published.



### 2.3.1 Fenland Local Plan (Adopted May, 2014)

38. Policy LP3 – Spatial Strategy, the Settlement Hierarchy and the Countryside, sets out the strategy for sustainable growth in the district, with growth primarily focused in and around the four market towns, one of which is Whittlesey. In particular, it states that “development should provide the scale and mix of housing types that will meet the identified need for Fenland (as informed by an up-to-date Cambridge Sub Region Housing Market Assessment (SHMA))”. It also designates the nearby villages of Coates and Eastrea as areas of limited growth and small scale development and Turves and Pondersbridge as a ‘Small Villages’ and ‘Other Village’ respectively in which development will be considered on its merits.
39. Policy LP4 – Housing sets the target number of homes for the entire district as 11,000, and that this should broadly be divided between the four market towns, with Whittlesey seeing 1,000 units developed, and the rest spread over the other towns, totalling 8,800 and other locations, totalling 1,200. It further states that large scale proposals of 250 dwellings or more on the edge of market towns should be directed to areas indicated for sustainable growth in the plan, and that for small scale proposals in or around market towns, policy LP16 should apply.
40. Policy LP5 – Meeting Housing Need, sets out the district’s requirements for the provision of 20% affordable housing on sites of 5 to 9 dwellings, in practice requiring one affordable dwelling and a proportionate financial contribution on each, and 25% on developments of 10 or more dwellings. Tenure mix should be informed by guidance and local housing need, which will inform an S106 agreement, subject to a viability assessment using a recognised model. It goes on to clarify that the same rules will apply for applications for multiple applications on ‘obviously linked’ sites within a five year period. It goes on to discuss the district’s ambitions for all housing to be Lifetime Homes accredited, and for affordable housing to be provided on site, both subject to viability considerations. The policy then sets out the detailed criteria which will be used to assess applications for Gypsy and Traveller and Travelling Showpeople caravan sites, and how need for them will be assessed.
41. Policy P11 – Whittlesey, sets out policies relating to the town, including where urban extensions will be supported, It makes provision for a strategic allocation of approximately 500 dwellings. It also sets out the requirements surrounding a potential regional freight interchange in the area, and the specific issues that will need to be taken into account in the context of such an application.

**Figure 7: Key Diagram for Whittlesey**



Source: FLP2014



## 3. Approach

### 3.1 Research Questions

42. This section of the study poses a series of Research Questions, abbreviated to 'RQ;' these have been arrived at through discussion with the parish at the start of the project. They serve to direct our research and provide the structure for the HNA.

#### 3.1.1 Quantity

43. The total of the housing numbers for the period 2011-31 set out by the local authority for Whittlesey and the villages in the parish (Coates, Eastrea, Turves & Pondersbridge) in planning documents (the Adopted Fenland Local Plan (AFLP) and the Village Thresholds Positioning Statement) is 1109 dwellings, of which 1000 are to be delivered in the town of Whittlesey<sup>4, 5</sup>. The community is however concerned that these numbers may underestimate the number of dwellings required to meet the needs of the NPA.
44. Whittlesey Town Council (WTC) therefore wishes to establish a better idea of quantity of homes needed to satisfy demand. While recognising the desire among residents that additional housing be kept to a minimum, the group is open to the possibility of more housing and accept that additional housing may be necessary to secure the additional infrastructure the community needs.
45. *RQ1. What quantity of housing is appropriate for the plan area?*

#### 3.1.2 Tenure

46. Whittlesey Town Council recognises a need for affordable housing in the area. WTC is therefore interested in the tenures of affordable housing to meet local need, and what proportions these should achieve.
47. *RQ2. What tenures of affordable housing (social housing, affordable rented, shared ownership, intermediate rented) should be included in the housing mix?*
48. *RQ3. What tenure of market housing (private rented and housing for sale) should be included in the housing mix?*

#### 3.1.3 Type and Size

49. The inception call indicated that local young people are struggling to get onto the housing ladder. Likewise, there appears to be a need among older people to downsize.
50. *RQ4. What type (terrace, semi, bungalows, flats and detached) and size (number of habitable rooms) of housing is appropriate?*

#### 3.1.4 Housing for older people

51. WTC wishes to quantify the need for dwellings suited to older people in the community and how these should be met
52. *RQ.5 What provision should be made for retirees and the elderly?*

## 3.2 The Housing Market Area

53. Identifying the Housing Market Area (HMA) within which Whittlesey sits is important as it justifies the use, and degree of weight that may be accorded to, data drawn from secondary sources, such as the 2013 Strategic Housing Market Assessment 2013 (SHMA, 2013) that informs housing policy at the district level. Planning Practice Guidance (PPG) defines a Housing Market Area as a 'geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work'<sup>6</sup>.

<sup>4</sup> AFLP, page 19

<sup>5</sup> Village Thresholds Position Statement, 21/08/17

<sup>6</sup> PPG D 2a-010-130729



54. The starting point for identifying the HMA within which Whittlesey falls is the analysis set out in the SHMA. This document makes use of an authoritative study produced by the Centre for Urban and Regional Development Studies (CURDS), entitled The geography of housing market areas in England (2010). This study identifies HMAs centring on Cambridge, 'Bury St Edmunds and Peterborough'<sup>7</sup>.
55. The study then goes on to present a range of data to establish the rationale for a broader HMA that covers the jurisdictions of the seven local authority areas that constitute the public sector partnership seeking to assess housing needs at the sub-regional level. The authors however acknowledge this cuts across the CURDS boundaries; so as to distinguish this from HMA centred on key regional towns and cities, we refer to this as the 'sub-regional HMA'.
56. The question for this study is therefore to establish the HMA in which Whittlesey sits so as to place it in its proper context and make informed judgements as to the relevant socio-economic factors to be taken into account in considering its housing needs.
57. It is possible to identify two tiers of HMA for the purpose of understanding housing need at the sub-regional level. These are Strategic Housing Market Area based on 77.5% commuting self-containment, and Local Housing Market Areas based on 50% migration self-containment. 'Commuting self-containment' refers to travel to work patterns and 'migration self-containment' relates to people moving house. These criteria require that, in the case of Strategic HMAs, that 77.5% of commuting journeys take place within the geographical boundaries of the HMA and, in the case of Local HMAs, that 50% of house transactions involve people moving within the boundaries of the HMA. Clearly, where both these criteria are satisfied, a strong HMA can be said to exist with striking commonalities in terms of need and demand across the area.
58. Geographically, Whittlesey sits north-west of Cambridge close to Peterborough. In Figure 8: Map of TTWAs taken from Hometrack below we reproduce SHMA Map 6, showing regional TTWAs centring on Cambridge. From this map it is clear Whittlesey falls into the Peterborough TTWA.

**Figure 8: Map of TTWAs taken from Hometrack**



Source: Hometrack (blue line denotes boundary of Cambridge TTWA, other TTWA areas boundaries shown with grey lines)

59. In Table 3 below we set out commuting data drawn from the Census. Given travel by road to Cambridge is over 30km, this suggests less than 10% of Whittlesey's working population travel as far as Cambridge to their place of work; moreover, well over 50% work either at home or within 10km. Again, this leads to the conclusion that Whittlesey is only weakly affected with the dominant sub-regional economy, that of Cambridge, but should be considered within the more localised setting of Peterborough.

<sup>7</sup> SHMA13, page 4

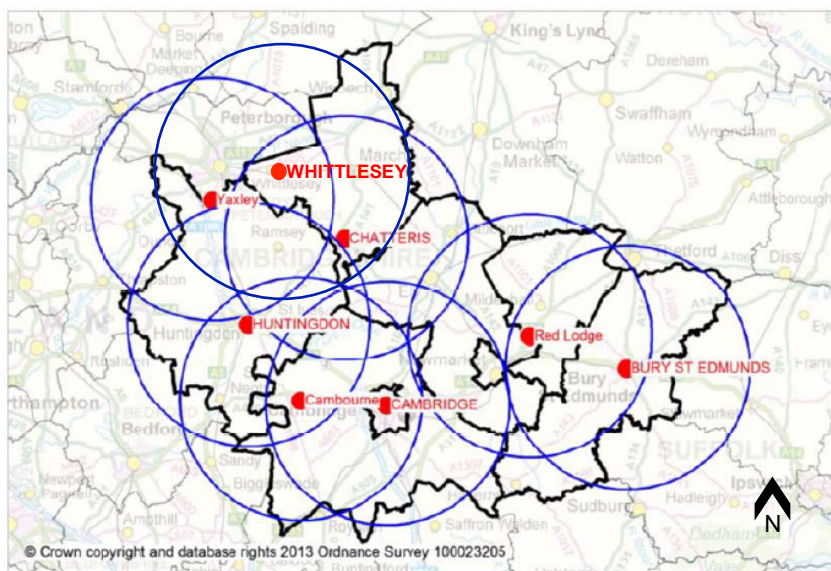
**Table 3: Distance to work, 2011**

Location of work	Whittlesey	Fenland	England
Less than 10km	43.3%	41.8%	52.3%
10km to less than 30km	29.7%	26.2%	21.0%
30km and over	9.3%	12.2%	8.0%
Work mainly at or from home	9.7%	10.5%	10.3%
Other	8.1%	9.3%	8.5%
Average distance travelled to work	17.3km	18.6km	14.9km

Source: Census 2011, AECOM Calculations

62. In Figure 9 below we reproduce SHMA Map 4 which shows the locations of various developments with a 20km radius circle drawn around each one. The 20km circles around each site represent the 59% of households who moved into new developments from 20km away or less. The circles demonstrate that for developments in Whittlesey, it is probable that a large proportion of new residents will have come from the Cambridge sub-region, whether from the same or a different local authority district.<sup>8</sup>

**Figure 9: 20km radii of major development sites**

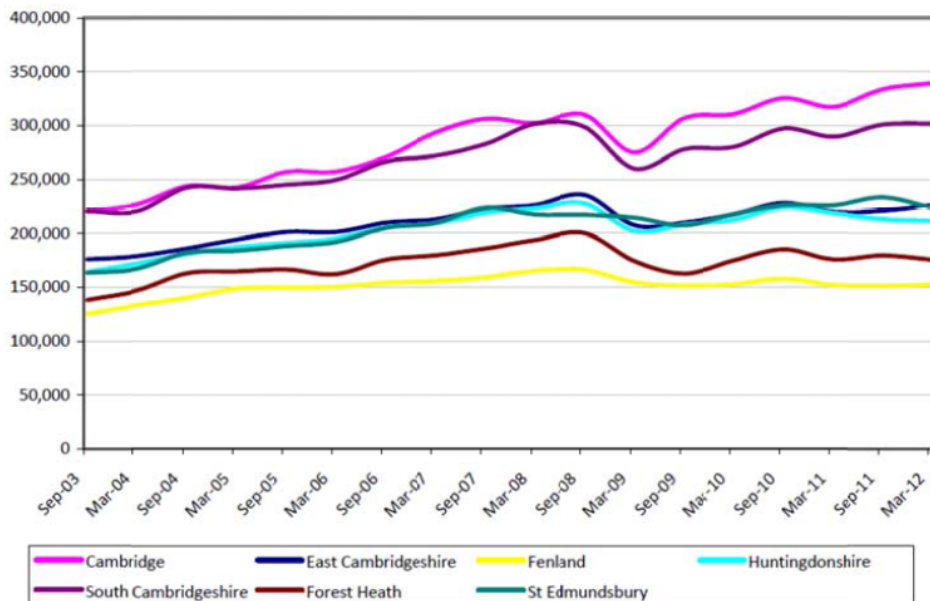


Source: SHMA, adapted by AECOM

- 63. For the purposes of identifying the HMA that Whittlesey falls into, this presents evidence that it is outside Cambridge’s sphere of influence based on TTWAs and, though to a lesser degree, migration self-containment.
- 64. Given this scenario, evidence in the SHMA should be used with caution where it presents data gathered for the sub-regional HMA, without drilling down to the level of the individual districts. It is however helpful, particularly where data is presented that identities contrasts between Fenland and the broader sub-region.
- 65. One such example is the Figure 10; this reproduces SHMA figure 3<sup>9</sup> charting the relationship between house prices across the Cambridgeshire sub-regions between 2003 and 2012. This firstly demonstrates the influence that Cambridge has over that geography closest to it, and how this influence dissipates quickly moving to the northern parts of the county, where Whittlesey is located. The figure below shows that Fenland is the most affordable part of the county, with average house prices of around £150,000, compared with Cambridge of almost £200,000 more.

<sup>8</sup> SHMA 2013, chapter 2 page 9/10  
<sup>9</sup> SHMA section 12.2 page 15

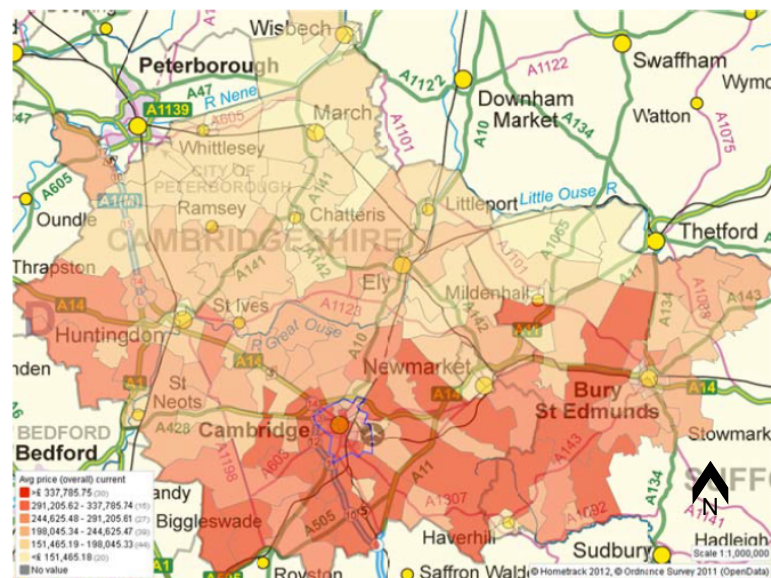
Figure 10: Average prices for individual districts over time



Source: SHMA13

66. In Figure 11 below we reproduce SHMA figure 40; this shows the contrast in house prices between the northern and southern parts of the county, with the north escaping the influence of Cambridge as a centre of economic activity, as well as the wider effect of the London mega-city region.

Figure 11: Average property prices, shown by ward



Source: Hometrack March 2012, SHMA13

67. Further PPG guidance states that ‘no single source of information on needs will be comprehensive in identifying the appropriate assessment area; careful consideration should be given to the appropriateness of each source of information and how they relate to one another. For example, for housing, where there are issues of affordability or low demand, house price or rental level analyses will be particularly important in identifying the assessment area. Where there are relatively high or volatile rates of household movement, migration data will be particularly important. Plan makers will need to consider the usefulness of each source of information and approach for their purposes. Local planning authorities can use a combination of approaches where necessary.<sup>10</sup>

<sup>10</sup> PPG Paragraph: 009 Reference ID: 2a-009-20140306 Revision date: 06 03 2014

68. For the purposes of this study, we therefore make use of data presented in the SHMA documents advisedly and, in accordance with PPG, do not want to lose sight of Whittlesey's specific characteristics that distinguish it from the wider HMA. Moreover, we seek to identify 'market segments' i.e. the notion that not all housing types or economic development have the same appeal to different occupants<sup>11</sup>.

### 3.3 RQ1. What quantity of housing is appropriate for the Neighbourhood Plan Area?

69. We have estimated the quantity of housing needed in NPA according to four different sources; these are,
1. Adopted Fenland Local Plan (AFLP) 2011-2031 generates a projection of **1,778 dwellings (1870-92) between 2017 and 2031 or 127 homes per year (rounded)**
  2. SHMA derived figure based on a proportional share drawn from OAN which generates a projection of **1,948 dwellings over the plan period, or 139 per year (rounded).**
  3. DCLG Household projections which generate **a re-based household projections-derived figure of 1,618, or 116 dwellings (rounded) over the plan period.**
  4. A projection derived from homes growth between 2001 and 2016 of **1,120 homes over the plan period of 2017-2031.**

These calculations are set out below.

#### 3.3.1 Adopted Fenland Local Plan (AFLP) 2011-2031

70. The AFLP, dated May 2014, puts forward a housing requirement for 11,000 for the district over the Plan Period between 2011 and 2031 under Policy LP4<sup>12</sup>. As we have seen, the document also set out an 'approximate target' for each of the market towns, of which Whittlesey is one. As we have seen, the housing target for the parish is 1109 dwellings.
71. The method we use to arrive at an estimate of housing need based on the district housing number relies on the notion of the 'fair share.' Taking the district figure of 11,000 as a starting point, the 'fair share' that may be apportioned to WTC is calculated from the proportion of homes in the district that fall within the Parish as recorded in Census 2011. At the time of the last Census there were 7,186 dwellings in the NPA, or 17% of all homes in the district. Therefore, 1,870 homes (17% of 11,000) homes should be allocated as the 'fair share' of the district target.
72. In arriving at a final total for WTC, it is important to take into consideration that 92 dwellings were built between 01/04/11 and 31/03/16 in the NPA<sup>13</sup>. This produces a total of 1,778. Allowing for these completed dwellings, a housing target for WTC that is in conformity with AFLP is **1,778 dwellings (1870 dwellings -92 completed dwellings) between 2017 and 2031 or 127 homes per year (rounded).**

#### 3.3.2 Strategic Housing Market Assessment (SHMA) 2013

73. It is important to remember that the SHMA presents a demand-side only, or 'unconstrained' assessment of need (often identified as Objectively Assessed Need, or OAN ), as opposed to a final housing target. The final housing target will take into account a number of other supply-side factors, including for example the availability of land, viability, infrastructure and environmental constraints and the results of consultation.
74. The evidence base for the AFLP consists of the SHMA; this identifies an OAN of 12,000 for Fenland.
75. Putting forward a projection derived from SHMA 2013 is appropriate because it is a document that has been tested through a planning examination and takes into account population and household projections, as set out in the 2012 Sub-National Population Projections. These provide the basis for DCLG Household Projections, the starting point in determining need at the local authority level as recommended by PPG.
76. To calculate the NPA's 'fair share' of this target, it is again possible to use Whittlesey's proportion of all housing in the borough (17%). This produces a figure of 2,040 dwellings (rounded). Furthermore, it is necessary to take

<sup>11</sup> PPG Paragraph: 008 Reference ID: 2a-008-20140306

<sup>12</sup> AFLP, page 18

<sup>13</sup> FDC, Fenland Monitoring Report, January 2017, page 11



into consideration homes built in the NPA in recent years; since 2011, as set out above, 92 dwellings have been built; producing a final target of 1,948 dwellings over the plan period, or 139 per year (rounded).

### 3.3.3 DCLG Household Projections

77. The Department for Communities and Local Government (DCLG) periodically publishes Household Projections. As stated earlier, PPG recommends that these household projections should form the starting point for the assessment of housing need.
78. The most recent (2014-based) household projections were published in July 2016, and extend to 2039. Although population projections are only available at a local authority level, a calculation of the share for the NPA is nevertheless possible for the household projections based on the NPA's household numbers in the 2011 Census.
79. At the 2011 Census, Fenland had 40,620 households and the NPA 6,918 households, or 17% of the total (rounded).
80. In the 2014-based household projections, the projection for 2031 is for 49,431 households in Fenland. Assuming it continues to form 17% of the district total, the NPA's new total number of households would be 8,403 (rounded); therefore 1,485 new households form in the NPA between 2011 and 2031 (or a rate of growth of 74 households per year).
81. Number of households does not, however, equate precisely to number of homes, with the latter slightly higher in most places. The NPA is no exception; in the 2011 Census, there were 6,918 households but 7,186 homes. This gives a ratio of .96 households per home. In the case of NPA, then, a projection of (1485 / 0.96) new households translates into a need for 1,546 homes (rounded).
82. These figures are based on the assumption that 2014-based government projections as to household growth at the Local Authority level are accurate. As the annual mid-year population estimates have now been released for 2016, the 2014-based household projections may need to be 'rebased' for accuracy. The mid-2016 population estimates give the actual number of people in the NPA at that point, meaning the difference between the estimated and the previously projected number of households can to be taken into account in future projections.
83. The 2014-based household projections were based on the 2014-based Sub-National Population Projections, which estimated that by 2016 there would be 99,258 people in Fenland. The mid-2015 Estimates show that based on the latest information there were estimated to be 100,182 people, which is higher than the projections by 924 people. Assuming average household sizes remain constant (in 2011 there were an average of 2.32 people per household, obtained by dividing population by number of households) this equates to 398 more households across Fenland.
84. Taking 50,355 (49,431 + 924) as our revised household number at 2031, this equates to 8,560 households in the NPA (rounded), producing a revised growth in the number of households between 2011 and 2031 of 1,642. Taking into account the disparity between household numbers and dwelling numbers (1,642 / 0.96), this produces a figure of 1,710 homes. Netting off the 92 dwellings completed since 2011, we arrive at a re-based household projections-derived dwellings of 1,618, or 116 dwellings (rounded) over the plan period.
85. This projection is an entirely unconstrained, theoretical figure comprising a relative proportion of the overall projected increase, and thus does not take into account political, economic, demographic or any other drivers that might have influenced, or may in future influence, the Local Plan distribution across the District and hence any difference between this figure and a future Local Plan-derived figure.

### 3.3.4 Home growth 2001 – 2011

86. Consideration of home growth 2001-2011 provides a projection based on the rate of delivery of net new homes between the two censuses. As we have seen, there was an increase of 1107 homes in the NPA between these two dates, or an average annual rate of increase of 111 homes (rounded). Multiplying this annual figure by the number of years remaining of the plan period from 2016 (14) **produces a gross need for 1550 homes** (rounded).

### 3.3.5 Home growth since 2011

87. It is also helpful to consider a projection based on the rate of delivery of net new homes since the last census (2011), using data gathered and monitored by the LPA. As we have seen, between 1<sup>st</sup> April 2011 and the 31<sup>st</sup>

March 2016, 92 new dwellings were completed. This equates to an annual rate of delivery of 18.4 homes (92 divided by 5, the number of years elapsed). If this rate of delivery was continued to 2031, this would equate to **a projection of 258 homes over the plan period of 2017-2031** (18.4 x 14, rounded to the nearest whole number).

88. It is important to note the great disparity between the two 'home growth' figures; this reflects the susceptibility of the development industry to fluctuations in demand and costs of development, among other factors. To allow for these peaks and troughs, and provide a more realistic picture of the quantum of development could be delivered over the plan period, we have taken the aggregate of the homes growth between 2001 and 2016; this comes to 1199 (1107 + 92) dwellings. Expressed as an annual average rate, this is 80 dwellings /year (rounded). This produces **projection derived from homes growth between 2001 and 2016 of 1120 homes (80x14) over the plan period of 2017-2031.**

### 3.4 RQ2, What type of affordable housing (social housing, affordable rented, shared ownership and intermediate rented) should be included in the housing mix?

89. The PPG states that HNAs should investigate household tenure in the current stock and recent supply, and make an assessment, based on a reasonable interpretation of the evidence gathered, whether continuation of these trends would meet future needs or whether, on account of any misalignment between demand and supply policies should support a change to the profile of housing tenure within the NPA's housing stock.<sup>14</sup>

#### 3.4.1 Definitional issues

90. It is necessary at this stage of the study to make clear the distinction between affordable homes as planning terminology and the colloquial meaning of the phrase. In the course of this study, we refer to Affordable Housing, abbreviated to 'AH'. This means that those forms of housing tenure that fall within the definition of Affordable Housing set out in the National Planning Policy Framework (NPPF): namely, social, affordable rented and various forms of intermediate housing. To distinguish this from the colloquial definition, we refer to the latter as Affordable Market Housing (AMH).
91. In this paragraph we briefly review the proposed reforms to the definition of AH set out in the Government's Housing White Paper published in February 2017. These reforms make clear the Government's commitment to home ownership but recognised the important role of affordable rent for those not currently seeking home ownership. The changes proposed would broaden the definition of affordable housing, supporting 'present and future innovation by housing providers in meeting the needs of a wide range of households who are unable to access market housing'. This would include 'products that are analogous to low cost market housing or intermediate rent, such as discount market sales or innovative rent to buy housing. Some of these products may not be subject to 'in perpetuity' restrictions or have recycled subsidy'.
92. The Housing and Planning Act 2016 made provision for a new simplified definition of affordable housing as 'new dwellings...to be made available for people whose needs are not adequately served by the commercial housing market'<sup>15</sup>. Secondary legislation is required to implement this definition, necessitating further parliamentary debate<sup>16</sup>.
93. The Housing White Paper<sup>17</sup> confirms that a revised definition of AH will be brought forward through changes to the NPPF later this year, proposing a definition as 'housing that is provided for sale or rent to those whose needs are not met by the market (this can include housing that provides a subsidised route to home ownership' and which 'meets the criteria' for one of the following models)<sup>18</sup>:
- **Social rented housing**, defined as currently owned by local authorities and private registered providers with guideline target rents determined through the national rent regime. It may be owned by other persons and provided under equivalent rental arrangements, as agreed with the local authority or Homes and Communities Agency;

<sup>14</sup> PPG Paragraph: 021 Reference ID: 2a-021-20160401

<sup>15</sup> Housing and Planning Act 2016, part 6, section 159 (4)

<sup>16</sup> Section 159(2) of the Act inserts '(3ZB) No regulations may be made under section 106ZB [which contains the updated definition of affordable housing] unless a draft of the instrument containing the regulations has been laid before, and approved by a resolution of, each House of Parliament'

<sup>17</sup> DCLG (2017) Fixing our Broken Housing Market (para A.120)

<sup>18</sup> Ibid (p100)



- **Affordable rented housing**, defined as currently owned and let by local authorities or private registered providers of social housing to households eligible for social rented housing. Affordable rent is controlled at no more than 80% of the local market rent, including service charges where applicable;
  - **Starter Homes**, as defined in the Housing and Planning Act 2016 and subsequent secondary legislation with an income restriction of £80,000 outside London. These homes are expected to provide a new low cost market housing product for first time buyers between the ages of 23 and 40 with a mortgage, sold for no more than 80% of open market value and capped at £250,000 outside London;
  - **Discounted market sales housing**, sold at a discount of at least 20% below market value with provision to remain at a discount for future eligible households. Eligibility is to be determined with regard to local incomes and house prices;
  - **Affordable private rent housing**, made available for rent at a level which is at least 20% below local market rent with provision to ensure that rent remains at a discounted level or alternative affordable housing provision is made if the discount is withdrawn. This is viewed as particularly suited to the provision of affordable housing in Build to Rent schemes; and
  - **Intermediate housing**, defined to include discounted market sales and affordable private rent housing – as outlined above – and other housing that is ‘provided for sale and rent at a cost above social rent, but below market levels’.
94. A transition period is proposed to enable a review of local policies, with the revised definitions intended to apply from April 2018. The Government also intends to introduce a requirement for sites of 10 units or more to ensure that at least 10% of all homes are affordable home ownership products, including Starter Homes, shared ownership homes and homes available for discount market sale.
95. The evidence assembled to answer RQ2 seeks to populate a series of ‘key indicators’; these are the age structure of the population, household composition and income both now and how they are forecast to change in future years. Through a consideration of these trends and how they interrelate to each other, it is possible to arrive at recommendations as to how not only the tenure of housing in the plan area, but also type and size, should be modified through planning policy.

### 3.4.2 Current tenure profile

96. Before we present this data, it is necessary to present a picture of tenure in the NPA at the moment. The table below presents Census data from 2011 that shows the heavy dominance of dwellings in owner occupation; this is substantially above the figures for both Fenland and England as a whole. The proportion of dwellings falling into social and intermediate forms of affordable housing is below regional and national trends at 9.1%.

**Table 4: Tenure (households) in Whittlesey, 2011**

Tenure	Whittlesey	Fenland	England
Owned; total	75.3%	70.0%	63.3%
Shared ownership	0.3%	0.5%	0.8%
Social rented; total	9.1%	12.4%	17.7%
Private rented; total	14.0%	15.6%	16.8%

Source: Census 2011, AECOM Calculations

97. The table below allows us to take a longitudinal perspective, identifying how the tenure profile of the NPA has shifted between the two last Censuses. From this, it is possible to identify a modest strengthening of the trend towards owner occupation, together with an increase in the private rented sector (PRS). It should be noted, however, that this starts from a fairly low base. In 2001 there were 391 PRS properties in Whittlesey; in 2011 this number has risen to 970. In addition, while the increase in shared ownership dwellings appears dramatic in this data, the total number in 2011 remained only 18 units. It is also worth noting that the number of dwellings for social rent fell by 1.7%, from 639 in 2001 to 628 in 2011.

**Table 5: Rates of tenure change in Whittlesey, 2001-2011**

Tenure	Whittlesey	Fenland	England
Owned; total	10.7%	7.9%	-0.6%
Shared ownership	100.0%	135.6%	30.0%
Social rented; total	-1.7%	3.9%	-0.9%
Private rented; total	148.1%	139.6%	82.4%

Source: Census 2001 and 2011, AECOM Calculations

98. Nevertheless, it does illustrate the capacity of the market to flex with demand. With a limit on the supply of affordable housing, PRS is helping fulfil a need for those households unable to buy their own home on account of insufficient household income and/or the lack of a purchase deposit.
99. In addition to providing a form of AMH, PRS also plays a de facto role in addressing AH need; this is evidenced in data, shown below in table 6, reproduced from SHMA 2013<sup>19</sup> showing the proportion of those households living in PRS housing who are also in receipt of Local Housing Allowance. The figure for Fenland is 48%, suggesting that a large proportion of PRS dwellings in Whittlesey may be de facto AH.

**Table 6: Private rented sector households and Local Housing Allowance**

	Private tenants receiving LHA (Feb 2013)	Private rented sector households (April 2011)	Estimated percentage of LHA recipients
Cambridge	1,278	12,258	10%
East Cambridgeshire	1,112	4,576	24%
Fenland	3,066	6,341	48%
Huntingdonshire	2,340	9,770	24%
South Cambridgeshire	1,176	7,174	16%
Forest Heath	1,320	6,195	21%
St Edmundsbury	1,675	6,798	25%
Cambridge sub-region	11,967	53,112	24%

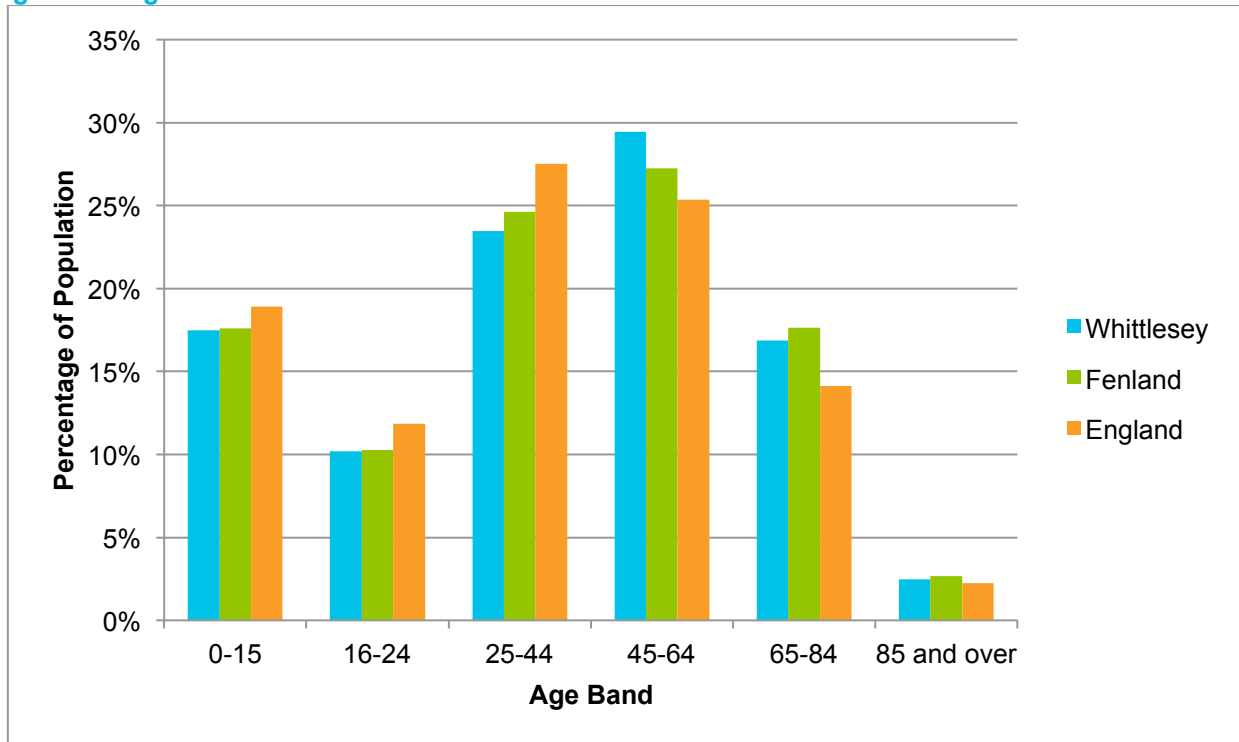
Source: DWP, Census, HSSA

100. Bringing the evidence relating to current tenure together, three dominant trends emerge: the dominance of owner-occupation, the declining stock of Affordable Homes (and the limited availability of forms of intermediate types of AH in particular) and the growth of PRS (a portion of which is likely to have made up for the loss of AH).
101. We are now in a position to consider evidence relating to the age structure of the community, household composition and affordability and what this tells us about whether the current tenure profile is likely to satisfy current and future community needs.

### 3.4.3 Age Structure

102. From the chart below, it is possible to discern some very clear trends; firstly, the relatively high proportion, when compared with regional and national averages, of people aged 45-64. Overall, those of working age constitute over 50% of the population. This corresponds with the proportion of the population of school age, falling into the 0-15 age bracket. Taken together, this suggests a strong family orientation to the neighbourhood. Furthermore, Whittlesey shares the trend seen at the district level of a high proportion of residents, falling into the older age bracket (65+), compared with national levels.

<sup>19</sup> SHMA 2013, Section 6.2, page 10

**Figure 12: Age Structure**

Source: Census 2011, AECOM Calculations

103. The table below shows the economic profile of the community. This suggests both economic stability (with a higher proportion of residents in employment, and fewer unemployed, when compared with both the district and national picture) as well as one with a higher proportion of retirees compared with England as a whole.

**Table 7: Economic activity in Whittlesey, 2011**

Economic category		Whittlesey	Fenland	England
Economically active	Total	72.3%	69.1%	69.9%
	Employee: Full-time	41.5%	39.4%	13.7%
	Employee: Part-time	15.0%	14.0%	38.6%
	Self-employed	9.8%	9.3%	9.8%
	Unemployed	3.6%	4.2%	4.4%
	Full-time student	2.4%	2.1%	3.4%
Economically inactive	Total	27.7%	30.9%	30.1%
	Retired	16.7%	17.1%	13.7%
	Student	2.8%	3.1%	5.8%
	Looking after home or family	3.6%	4.3%	4.4%
	Long-term sick or disabled	3.2%	4.5%	4.1%
	Other	1.5%	2.0%	2.2%

Source: Census 2011, AECOM Calculations

104. The table below provides an understanding of how the age structure has changed between the 2001 and 2011 Census. This suggests the population of the Parish is ageing more rapidly than Fenland, with the 65-84 age group increasing by 22.7% and those aged 85 and over increasing by 41.3%; in terms of the actual figures, the Census recorded a growth of 501 individuals for the former age group, and 117 for the latter, rising to a total of 2,711 and 400 respectively.

**Table 8: Rate of change in the age structure of the population of Whittlesey,**

Age group	Whittlesey	Fenland	England
0-15	-2.1%	2.3%	1.2%
16-24	22.8%	31.8%	17.2%
25-44	-4.2%	4.2%	1.4%
45-64	26.0%	22.1%	15.2%
65-84	22.7%	19.1%	9.1%
85 and over	41.3%	37.2%	23.7%

Source: Census 2001 and 2011, AECOM Calculations

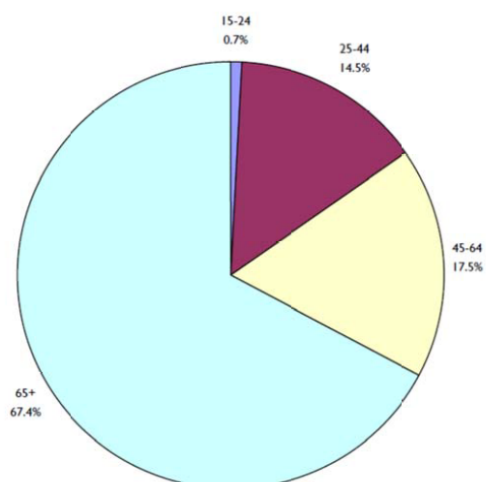
105. In the table below we reproduce Table 19 from SHMA 2013<sup>20</sup>; this provides a forecast of how the age structure is projected to change in future years at the sub-regional level divided into the various district authorities. The data for Fenland shows increases across all age groups; by far the largest proportional growth, however, is for those aged 65 and over.

**Table 9: Projected increase/decrease in each age group, 2011 to 2031**

Number of households	15-24	25-44	45-64	65+	Total
Cambridge	-168	1992	3406	4128	9358
East Cambridgeshire	70	1795	3208	7280	12353
Fenland	222	1191	2531	9466	13410
Huntingdonshire	-8	1564	966	13687	16209
South Cambridgeshire	100	3470	3100	11537	18207
Cambridgeshire	216	10012	13211	46098	69537
Percentage of the total increase	0.3%	14.4%	19.0%	66.3%	100%
Forest Heath	153	1312	1540	4163	7168
St Edmundsbury	255	1353	578	8813	10999
SHMA area	624	12677	15329	59074	87704
Percentage of the total increase	0.7%	14.5%	17.5%	67.4%	100%

Source: 'How many homes' toolkit (based on DCLG 2008-based household projections)

106. SHMA 2013 goes on to suggest that 67.4% of the increase in households across the whole housing sub-region may be accounted for by growth in numbers of those aged 65+. This is shown graphically in Figure 14, a reproduction of SHMA figure 4.<sup>21</sup> It is also important to acknowledge the substantial expansion of the working age population, an acknowledgement of the enduring appeal of this part of England as a place in which to bring up a family.

**Figure 13: % change in household numbers by broad age band, housing sub-region, 2011-31**

Source: 'How many homes' toolkit (based on DCLG 2008-based household projections)

<sup>20</sup> SHMA13, Section 12.2, page 29

<sup>21</sup> SHMA13, Section 12.2, page 30

107. Bringing the evidence relating to age structure together, we have identified Whittlesey as a place with a strong orientation towards family life, as well as a place of retirement. In the future, this profile is likely to continue, although with an increasing shift towards an older demographic as current family households mature into those of older couples and singles as their children set up households of their own, many of whom will do so outside the area. An important finding is that ageing is likely to affect Whittlesey with greater rapidity than for England or the sub-regional HMA in which it sits given that, within the town, the growth in numbers of those aged 65+ to 2031 represents 71% of overall population growth, compared with 67.4% of the HMA.

### 3.4.4 Household composition

108. In the table below we set out data from the Census that records household composition in the NPA; this shows a proportion of solo households that is comparable with the district and national levels. Indeed, the figures across the board suggest broadly comparable numbers with the wider district. It also captures the 'family' orientation of the neighbourhood, with 51% of all households having children (either dependant or non-dependant).

**Table 10: Household composition (by household) in Whittlesey, 2011**

Type		Whittlesey	Fenland	England
One person household	Total	27.6%	28.5%	30.2%
	Aged 65 and over	13.5%	14.3%	12.4%
	Other (under 65)	14.2%	14.2%	17.9%
One family only[1]	Total	67.6%	65.1%	61.8%
	All aged 65 and over	10.3%	10.7%	8.1%
	With no children	22.0%	20.8%	17.6%
	With dependent children	25.6%	24.7%	26.5%
	All children Non-Dependent	9.7%	8.9%	9.6%
Other household types	Total	4.8%	6.4%	8.0%

Source: Census 2011, AECOM calculations

109. The table reproduced from SHMA 2013 below provides a forecast of shifts in household composition in future years<sup>22</sup>. This suggests, at the district level, a large increase in one person households and couples living without children. Indeed, within Fenland, this constitutes roughly 58% of the total increase in household types. This reflects both empty nesters, as well as older people now living alone as a result of the death of their partner; to some degree it may also indicate a choice among younger people to postpone both marriage and children until later in life. The growth in households with children is modest in comparison.

**Table 11: Projected increase/decrease in each household type, 2011 to 2031**

Number of households	One person household	Couples on their own	Small families with one child	Larger families with child/children	Other households	Total
Cambridge	5,739	1,508	673	515	919	9,358
East Cambridgeshire	6,252	5,064	347	931	- 244	12,353
Fenland	7,820	5,418	394	531	- 757	13,410
Huntingdonshire	10,764	7,313	794	- 714	- 1,944	16,209
South Cambridgeshire	10,351	6,409	1,895	1,044	- 1,500	18,207
Cambridgeshire	40,926	25,712	4,103	2,307	- 3,526	69,537
% of total increase	59%	37%	6%	3%	-5%	100%
Forest Heath	4,578	1,667	455	516	- 57	7,159
St Edmundsbury	7,236	4,490	316	385	- 1,425	11,002
SHMA area	52,740	31,869	4,874	3,208	- 5,008	87,698
% of total increase	60%	36%	6%	4%	-6%	100%

Source: 'How many homes' toolkit (based on DCLG 2008-based household projections)

<sup>22</sup> SHMA 2013, Section 12.2, page 31

110. It is worth taking a moment to consider whether these trends are likely to be seen within Whittlesey. The table below sets out Census data showing how household composition has changed in the NPA between the 2001 and 2011 Censuses. From this it is possible to identify similar patterns to those observed in the table above, namely the increase in solo households, with an emphasis on those over 65+, and only modest increases of households with children.

**Table 12: Rates of change in household composition in Whittlesey, 2001-2011**

Household type		Percentage change, 2001-2011		
		Whittlesey	Fenland	England
One person household	Total	30.7%	20.2%	8.4%
	Aged 65 and over	16.8%	8.9%	-7.3%
	Other (under 65)	47.4%	34.3%	22.7%
One family only	Total	11.8%	10.3%	5.4%
	All aged 65 and over	9.9%	2.4%	-2.0%
	With no children	15.5%	14.5%	7.1%
	With dependent children	6.5%	8.3%	5.0%
	All children non-dependent	21.4%	17.6%	10.6%
Other household types	Total	27.6%	63.5%	28.9%

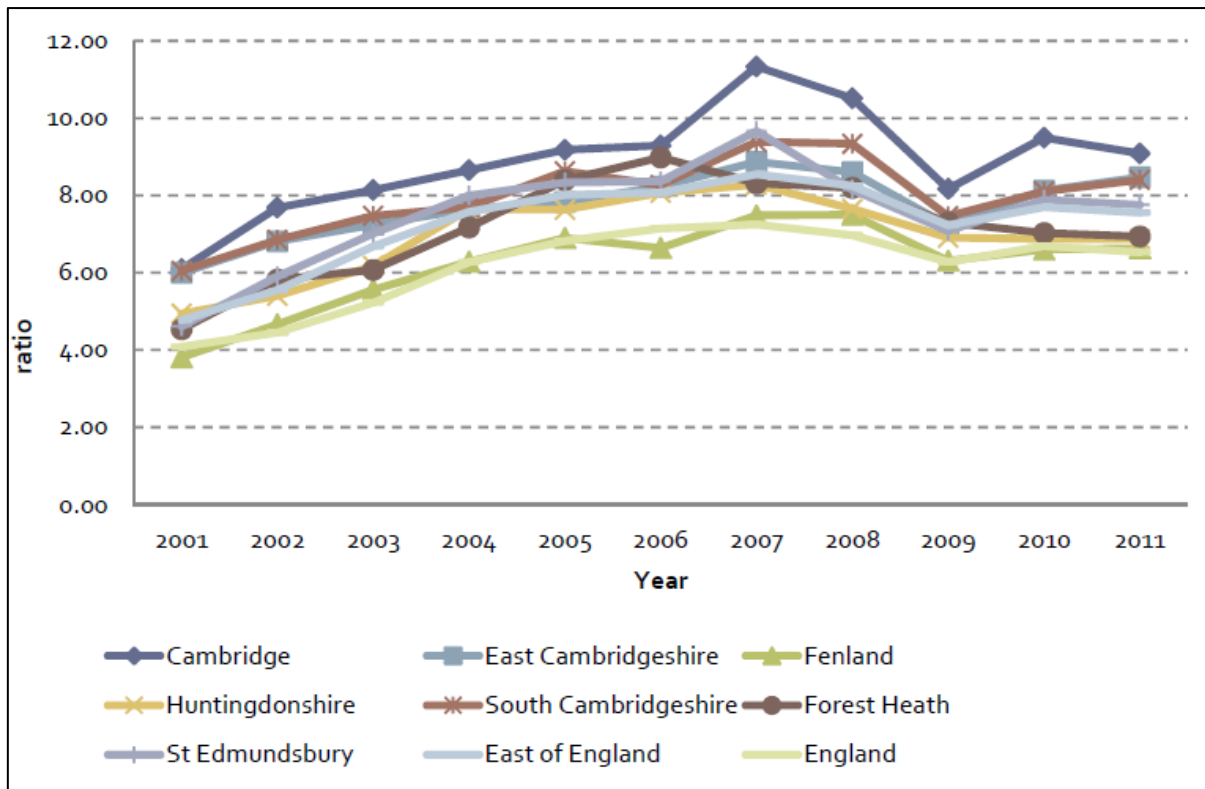
Source: Census 2001 and 2011, AECOM Calculations

111. Bringing the evidence relating to household composition together, we can conclude that one person households will make up the majority of household increases from 2011 to 2031, and that the majority of these are likely to be older residents. Notwithstanding, the neighbourhood will remain a place with a strong family presence, reflecting the area's continued appeal as a place to bring up children and its established identity as a family-orientated environment. The data assembled suggests families with children is a household type that is forecast to grow, albeit modestly, in the future.

### 3.4.5 Affordability

112. Affordability considers the relationship between price of a good, and the resources available to purchase it. In the context of housing, a useful though crude indicator that provides an understanding of this relationship is the Lower Quartile Affordability Ratio (LQAR); this produces a number that expresses lower quartile house-prices as multiple of lower quartile household income. This is helpful both as a way of understanding the extent to which those on lower incomes can access affordable market housing (AHM) for sale and the relative affordability of housing in the NPA compared to other places.
113. Below we reproduce SHMA figure 5 which shows how Fenland compares with other districts in the sub-region, and how affordability has fluctuated since 2001. The dip in 2008-2009 reflects the effect of the financial crisis on the housing market. At a LQAR of just over 6, housing in the district was the most affordable in the sub-regional HMA when this data was gathered.

Figure 14: Lower Quartile House Price to lower Quartile earnings ratio 2001 to 2011



Source: CLT Table 576 Downloaded Feb 2013

114. In the table below we reproduce SHMA Table 7<sup>23</sup> which provides a snapshot of affordability in February 2013. This again shows Fenland to be the most affordable of all districts, although for those on lower incomes, AMH for sale is beyond their means. At higher income levels, however, property is more affordable. The SHMA provides the following rule of thumb:

- A median house price to income ratio of 3.0 or less is “affordable”;
- 3.1 to 4.0 is “moderately unaffordable”;
- 4.1 to 5.0 is “seriously unaffordable”; and
- 5.1+ is “severely unaffordable”<sup>24</sup>.

Table 13: House price to income ratios

	Lower quartile house price: lower quartile income	Median house price: median income	Mean house price: mean income
Cambridge	13.96	9.07	8.95
East Cambridgeshire	8.96	6.00	5.65
Fenland	8.21	5.26	4.68
Huntingdonshire	8.09	5.38	5.15
South Cambridgeshire	10.48	6.91	6.88
Forest Heath	8.82	5.76	5.34
St. Edmundsbury	9.62	6.30	6.13
East of England	9.73	6.59	6.59

Source: Hometrack Sales and Valuations and CACI data downloaded Feb 2013

<sup>23</sup> SHMA 2013, Section 5.2, page 12

<sup>24</sup> SHMA 2013, Section 5.2, page 12

115. This is explored further in other data provided by a report commissioned by South Cambridgeshire District Council, 'Objectively Assessed Need Further Evidence' produced by Peter Brett Associates in November 2015. While this study assessed housing need in South Cambs, it generates comparative data of relevance to Fenland. In the table below we reproduce Table 37 setting out house prices within the localities that make up the sub-region as well as regional and national geographies.

**Table 14: Median house prices, 2014**

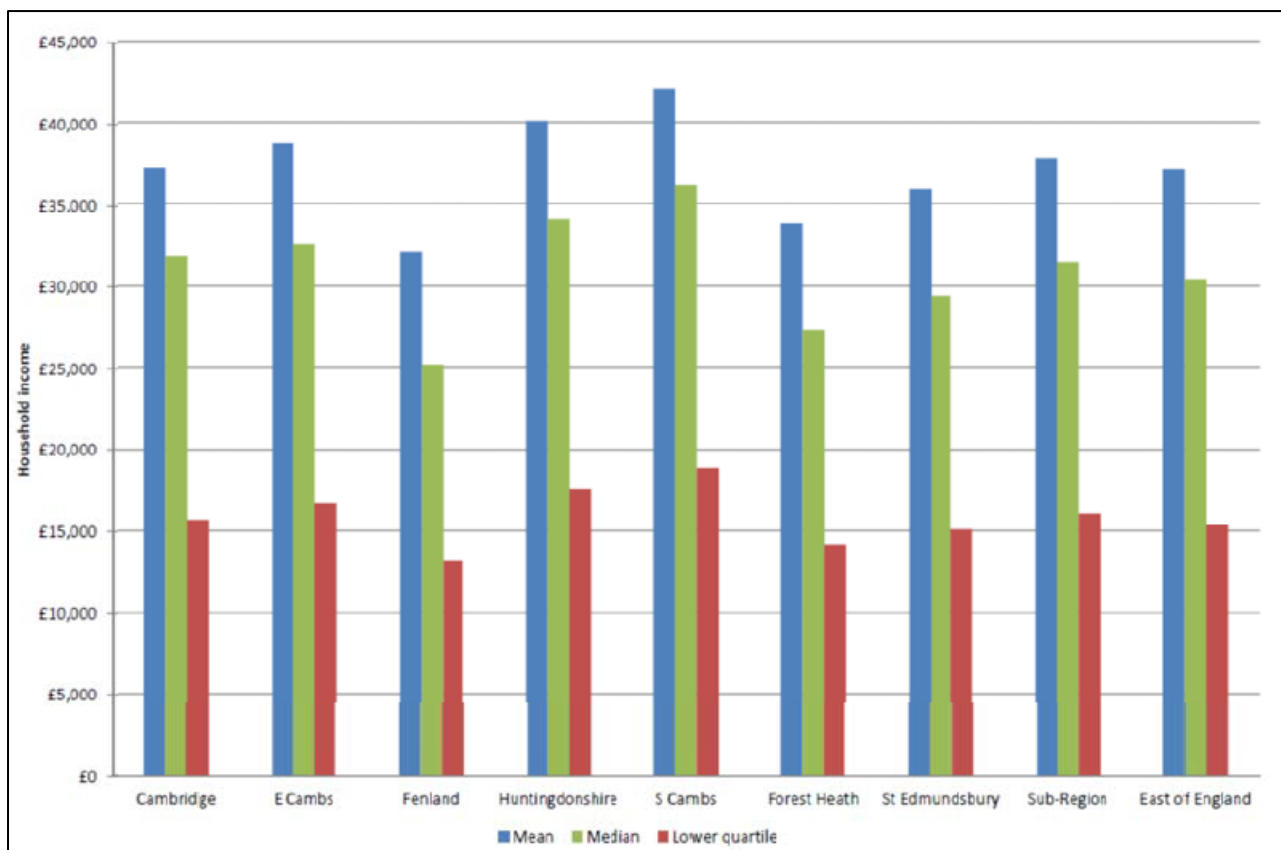
City of Cambridge	350,000
South Cambridgeshire	269,995
Huntingdonshire	198,250
Fenland	141,000
East Cambridgeshire	212,000
City of Peterborough	150,000
Forest Heath	162,500
St Edmundsbury	215,000
East of England	230,274
England and Wales	216,962

Source: ONS

116. Applying the multiple of 3.5, it is possible to use household income data to arrive at an understanding of affordability in respect of a number of income levels. Below we reproduce data from SHMA13 as Figure 15 providing data on household incomes within the various district authorities. Median income for Fenland is around £25,000. The table above shows a dwelling prices around the median in Fenland is £ 141,000; allowing for a 10% purchase deposit (reducing the purchase price down £126,900 for mortgage purposes), the income required to purchase a dwelling at this level would be around £36,257 ( $126,000 / 3.5$ ).
117. These calculations suggest that not only those on median incomes of £25,000, but those on a mean income of £32,000, would be unable to afford dwellings priced around the median.
118. As regards entry level properties (those priced substantially below the median), given the LQAR of 8.21 in February 2013 for Fenland set out in the table above and combining this with household income data in Figure 15 below, it is possible to calculate the approximate value of a property priced within the lower quartile as £106,730 ( $13,000 \times 8.21$ ).
119. At this price-point, again allowing for a 10% purchase deposit, the required income to afford a lower quartile dwelling is roughly £27,500. This suggests that just fewer than 50% of households in the Fenland district would be able to afford an entry level property, but that those on a mean income would be able to do so.



**Figure 15: Mean, median and lower quartile gross annual household income per year – all households**



Source: CACI, 2012 via Hometrack

120. SHMA 2013 provides specific data that quantifies the proportion of the population in Fenland that is unable to afford tenures of different types. It suggests that an income of £21,413 would be required to afford a three bedroom home defined as 'Lower quartile market purchase.' We reproduce Table 8 from the SHMA as the table below. This paints a rosier picture than the one described above and, from this we can conclude that, for a family looking to purchase an entry-level home on the open market, an annual income of around £25,000, the median for Fenland, is required.
121. From this data it is also possible to quantify the market for intermediate housing. Assuming a 3 bedroom dwelling remains our entry level home, shared ownership is less costly than PRS. If we assume that roughly 50% of households can afford to purchase a lower quartile market home, and 83% and 73% can afford shared ownership at 25% and 50% respectively, working in the assumption that people on the whole prefer (all things being equal) to own rather than rent their home, 23% of household would be able to opt for the 50% product and 33% of people for the 25% product (subject to eligibility).
122. An oddity in the figures presented below is that, despite PRS being less affordable than shared ownership, as we have seen, there has been a significant increase in private renting. This can however be explained by the restrictive eligibility criteria for shared ownership, the limit on the number of units available and a household's personal preference to rent, rather than buy, their own home.
123. Notwithstanding, if the rise of PRS has been explained in the past by households unable to afford to buy migrating to PRS as the only option open to them, this suggests shared equity and other forms of 'intermediate' housing, for example discounted market sale houses, will be attractive to many households currently excluded from the market on grounds of affordability.

**Table 15 (extract): % population unable to afford dwellings of different sizes and tenures**

	1 bed	2 bed	3 bed	All
<b>Unable to afford</b>				
Housing Association rent	13%	18%	20%	18%
LA rent	13%	15%	17%	15%
Affordable Rent (80%)	22%	27%	33%	30%
Shared ownership (25%)	11%	15%	22%	17%
Shared ownership (50%)	18%	23%	31%	25%
Shared ownership (75%)	27%	31%	42%	34%
Lower quartile private rent	27%	31%	39%	31%
Average private rent	28%	36%	43%	42%
Lower quartile market purchase	28%	40%	48%	47%

Source: *Hometrack House Prices (chapter 5)*, *VOA rents (chapter 6)*, *NROSH social rents (chapter 7)*, *CORE Intermediate sales (chapter 8)* and *CACI from Hometrack*.

124. So far, we have considered housing need based on a statistical understanding of affordability derived from household income. A necessary additional component to quantify need for AH in the NPA is identifiable demand expressed through entries on a housing needs register. In the absence of such a register that is specific to the NPA, the data contained in the Housing Waiting List for the whole district maintained by FDC may be used.
125. We contacted FDC for their assessment of the number of households currently on the waiting list with a local connection with Whittlesey. They reported back there are currently 75 applicants on the housing waiting list that have such a connection. These are broken down as follows:
- Emergency 1
  - Band A 9
  - Band B 23
  - Band C 15
  - Band D 27
126. As indicated above, like most affordable housing waiting lists, the list for Fenland is banded, whereby the four top bands (emergency, A, B and C) comprise identified affordable housing need while the lowest band (D) is named 'non-priority housing'. In line with standard housing needs assessment practice, we have discounted households designated 'D' so that our assessment covers only those in genuine priority need of affordable housing.
127. Although the waiting list is only a snapshot in time, there are 48 households in need of affordable housing at present. Taking the average of the four projections set out earlier (1616 dwellings), this represents 3% of this number. As we have seen, **Policy LP5** sets out the district's requirements for the provision of affordable housing in new residential developments, 20% affordable housing on sites of 5 to 9 dwellings, in practice requiring one affordable dwelling and a proportionate financial contribution, and 25% on developments of 10 or more dwellings.
128. Given the relatively small requirement for affordable housing that the HLW data seems to should, there does not appear to be a requirement for the Whittlesey Neighbourhood Plan to set its own affordable housing target. Nevertheless, it may reference the need to monitor Fenland's list and mention the need to work closely with the District Council in general to ensure the needs of those on the housing waiting list continue to be met. In addition, given there is no requirement for affordable housing on schemes of 1-4 dwellings, the Neighbourhood Plan should consider a policy for off-site contributions or 1 dwelling in the case of schemes of 3-4 homes, subject to viability.
129. Bringing together the evidence we have assembled relating to affordability, people's ability to access market housing has worsened significantly in recent years, with the LQAR reaching 8.21 in February 2013 in Fenland for those on low incomes. Dwellings do however, remain more affordable for those on incomes around the median and mean, registering 5.26 and 4.68 respectively. These groups are benefitting from relatively buoyant income levels for those in good employment, combined with property values well below the average for the sub-region. For those on modest incomes, this makes Whittlesey and attractive place to set up home, reinforcing its strength and established identity as a family-orientated environment.






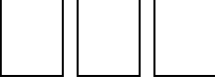
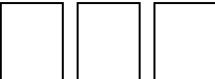


130. Our analysis suggests an income of £36,257 would be required to buy homes valued around the median. SHMA data indicates an income of £21,413 would be required to access a three-bedroom entry level property; an alternative approach suggests this may be low, leading us to believe an income of £25,000 would be a more realistic figure. Given that £25,000 is the median income for Fenland (at 2012), it is reasonable to conclude that roughly 50% of households are able to access affordable market housing for sale (AMH).
131. The relationship between house prices and household income that has emerged from the evidence suggests forms of discounted market sale housing would be appropriate in addressing housing need. Given current adopted affordable housing policy<sup>25</sup> seeks 20% of dwellings to be affordable housing on sites of 5-9 dwellings and 25% of the dwellings on sites of 10 or more dwellings (and that this should be enough to satisfy demand emanating from those with a local connection with the NPA based on Housing Waiting List data) there is no requirement for the Whittlesey neighbourhood plan to set its own policy.
132. We would caveat the finding in paragraph 131 above by recommending that a robust approach should be adopted for securing affordable housing on sites. For example, expressing support for development where a clear commitment is made to a percentage of dwellings being affordable in line with policy LP5.

### 3.4.6 Market Segmentation

133. Bringing together the evidence from our consideration of affordability, age structure and household composition, in line with PPG, we have sought to identify the different market segments in the population of Whittlesey. We then use this understanding to put forward recommendations for policy relating to Affordable Housing as well as and size and tenure of dwelling.
134. In order to understand the terminology surrounding size of dwellings, it is important to note the number of rooms recorded in Census excludes kitchen, bathrooms and toilets. In the market segments table that follows, 'dwelling size' should be translated as follows:
- 1 room = Bedsit
  - 2 rooms = flat/house with one bedroom
  - 3 rooms = flat/house 2 bedrooms
  - 4 rooms = flat/house with 2 bedroom and 2 reception rooms, or 3 bedrooms and 1 reception room
  - 5 rooms = flat/house with 3 bedrooms and 2 reception rooms
  - 6 rooms = house with 3 bedrooms and 3 reception rooms or 4 bedrooms and 2 reception rooms
  - 7+ rooms = house with 4, 5 or more bedrooms house
135. The table below indicates the different market segments, and the degree to which they are a growing, stable or declining group within the local population. One 'up' arrow indicates this grouping is growing modestly in the NPA; two 'up' arrows indicates strong growth, three 'up' arrows suggests very rapid growth in years to come. Where segments are falling in numbers, or not growing, neutral or down arrows are shown.
136. It is important to note that, as we have seen, the market is good at picking up growth trends in the market. For this reason, policy intervention is only justified in the case of market failure (where the market is unable, for reasons of viability, or there are incentives, deliberate or otherwise, that result in an unresponsive market). Examples include the failure of the market to provide homes to those on low incomes and the under-supply of dwellings for the elderly.
137. Similarly, because we believe in the capacity of the market to deliver the homes required for the majority of residents (either through for-sale dwellings or for-rent), policy intervention is only required in the most extreme circumstances. This is because policies carry both costs and risks; this can distort the market, preventing it from providing homes (and encouraging a position of market equilibrium in which homes are accessible to target markets). Therefore, where three 'up' arrows have been identified, this provides a rationale for policy intervention.

<sup>25</sup> AFLP, page 19

**Table 16: Housing market segments**

Market segments	Income range	Tenure	Presence in Plan Area	Size of home
Young family where parents are aged 24-44 with two children aged 0-15	Median	PRS, Social housing, shared equity, AMH		5 rooms
Professional Head of Household Young family where parents are aged 24-44 with two children aged 0-15	Mean	AMH, Market Housing (MH)		5 rooms
Professional Head of Household family where parent are aged 44-64 with non-dependent children living at home	>Mean (equity rich)	Market Housing		6+ rooms
Lone parent with two children	Lower Quartile (equity poor)	Social Housing		3 rooms
Solo household aged under 65	Median (equity poor)	PRS, shared equity, DMH		2 rooms
Solo household aged over 65 with wealth	Median (equity rich)	Market Housing		2-3 rooms
Solo household aged over 65 without wealth	Lower Quartile (equity poor)	Social Housing		2 rooms
Young couple w/o Children aged under 34	>Mean (equity poor)	Market Housing, Shared Equity, DMH		4+ rooms
Concealed households	Lower Quartile (equity poor)	Social Housing		1-3 rooms

Source: AECOM

From this analysis, we can draw the following initial conclusions,

- In terms of tenure, the predominant beneficiary of social housing will be young families and solo/couple pensioner households on median incomes and below. Both these groups are forecast to grow in number over the Plan Period, providing a strong rationale for a sizable component of social housing within the overall quota of Affordable Housing (AH) secured as a result of development
- Market housing, both affordable (AMH) and more expensive properties will be in demand in future years
- There may be an under-supply of smaller dwellings, those sized between 2 and 3 rooms
- For those ineligible for AH and cannot access AMH for-sale, PRS dwellings will be attractive, underpinning the growth of this market we have seen in recent years
- Within the housing mix moving forward there should be a mix of dwellings types and sizes to underpin the continued role of the NPA as a good place to bring up children, suggesting dwellings of 5 rooms+.

### 3.4.7 'Starter Homes' and discounted market housing

138. As we have seen, the Housing and Planning Act 2016 (HPA) includes provisions to introduce a general duty on planning authorities in England to promote the supply of 'starter homes,' and a specific duty to require a minimum number or proportion of 'starter homes' on certain residential development sites. At the time of writing, however, the relevant legislative provisions are not yet in force and no specific proportion or minimum has been put forward.
139. The Housing White Paper sheds further light on the government's intentions in this area. It states that, 'in keeping with our approach to deliver a range of affordable homes to buy, rather than a mandatory requirement for 'starter homes,' we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. It will be for local areas to work with developers to agree an appropriate level of delivery of 'starter homes', alongside other affordable home ownership and rented tenures.
140. This is a substantial watering-down of the 'starter home' requirement as envisaged when policy contained in the Housing and Planning Act was first conceived. In effect, it leaves it to local groups, including neighbourhood plans, to decide an appropriate level of affordable home ownership products, while taking note of the 10% policy expectation.
141. The decision whether to treat Discounted Market Sale Homes (DMSH) as affordable housing should be determined by whether lowering the asking price of new build homes of a size and type suitable to first time buyers by 20% would bring them within reach of people currently unable to access AMH for sale.
142. As we have seen, AMH in Fenland is at a price where entry level dwellings are affordable to households with incomes around the median, and above. For this reason, DMSH do offer a realistic means for those on lower incomes to access the property market.
143. On the basis of the evidence we have gathered, we would therefore recommend DMSH form part of the AH quota within the NPA, with policy seeking to fulfil the 10% policy expectation. We note that 20% is a minimum discount and, of course, greater discounts will make the policy more effective in enabling households on modest incomes afford to buy their own home. The ultimate level of discount should be arrived at on a site-by-site basis and will be determined by viability as well as other calls on finite resources stemming from planning gain, such as other forms of AH and infrastructure requirements.
144. While the Housing White Paper does not specify scale of development (i.e. number of units proposed), it is appropriate for this to be taken into account when considering how the 10% policy expectation should be applied in practice. When the policy was conceived, it was linked to the notion of rural exception sites, land that would normally not be considered for housing, to bring forward substantial numbers of affordable dwellings where there is evidence of local need.
145. Given the projections for housing need over the Plan Period are substantial, it is appropriate for the WTC to plan for 'Starter Homes' within their overall approach to meeting housing need in the community.

### 3.4.8 Shared ownership

146. As we have seen, the shared ownership tenure has seen growth in the NPA between the 2001 and 2011 Censuses. It is therefore worth considering its future role in Whittlesey. Shared ownership involves the purchaser buying an initial share in a property typically of between 25% and 75% and paying rent on the share retained by the provider. Shared ownership is flexible in two respects, in the share which can be purchased and in the rent payable on the share retained by the provider. Both of these are variable.
147. The share owned by the leaseholder can be varied by 'stair-casing'. Generally, stair-casing will be upward, thereby increasing the share owned. In exceptional circumstances (as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own.
148. Shared ownership constitutes a form of AH, targeting those on incomes around the mean; as such, it is termed 'intermediate' and is available to both first-time buyers, people who have owned a home previously and council and housing association tenants with a good credit rating whose household income does not exceed £60,000. Given these conditions, it is not surprising why it has started to taken root in Whittlesey, on the basis of the affordability analysis discussed above, it should form part of the AH mix in the Parish.

### 3.4.9 Affordable Rented Dwellings

149. In the table below we reproduce SHMA 2013 Table 18<sup>26</sup>, this shows that, at a maximum level of 80% of market rents, Affordable Rent Dwellings (ARD) remain unaffordable to 30% of households. Elsewhere, the SHMA suggests that a household income of £17,280 would be required to afford ARD<sup>27</sup>. At this level, ARD is in competition with various forms of shared ownership homes.

**Table 17: Summary of affordability by tenure across districts (percentage of households unable to afford 2011/12)**

	Housing Association rent	Maximum Affordable Rent	50% shared ownership	Lower quartile rent	Lower quartile purchase
Cambridge	24%	40%	33%	41%	60%
East Cambridgeshire	22%	29%	24%	31%	42%
Fenland	25%	30%	25%	32%	39%
Huntingdonshire	16%	24%	22%	24%	37%
South Cambridgeshire	18%	30%	25%	31%	47%
Forest Heath	20%	36%	27%	38%	41%
St Edmundsbury	18%	31%	27%	35%	45%

Source: SHMA2013, Tables 3-9

150. Commentators have repeatedly raised concerns about ARD not constituting a realistic form of AH given that in many areas this reduces rent to levels that are still beyond the means of the target group: those on incomes substantially below the mean.
151. For this reason, for ARD to add to the menu of AH available in the NPA, rent levels should be set substantially below 80% so as to avoid competition with intermediate products, offering a route to housing for households on lower quartile incomes.

<sup>26</sup> SHMA, section 10.2, page 23

<sup>27</sup> SHMA, section 10.2, page 13

### 3.5 RQ4. What type of market housing (private rented and housing for sale) should be included in the housing mix?

152. Given the limited quantity of affordable housing in the NPA, the needs of the great majority of the people will be served by the market. People on higher incomes will be able to access a variety of market dwellings; their choices will be driven principally by how much they can afford to spend, the extent to which old age is driving their choice of home, and personal taste.
153. As explained previously, the operation of the market is the best means of addressing the demand for different types of housing for sale. It is important planning policy does not place unnecessary burdens on the market preventing its ability to respond to demand; this is, after all, the principal way equilibrium is achieved in the housing market and house price growth is kept in check. In this sense, the notion of viability is essential. It is important not to deter development in the context of clear housing need; to do so will not only frustrate the delivery of new housing but also may deprive the community of resources for infrastructure improvements.

#### 3.5.1 Build to rent

154. There is evidence of growing demand for private rent accommodation in the NPA. The SHMA suggests that, at the sub-regional HMA level, 'on-going changes to the benefit system and the way social housing is allocated are likely to increase demand on the private rented sector, especially at the lower-cost end of the market.'<sup>28</sup> Given the very substantial increases in PRS revealed by Census data, this trend is one shared by Whittlesey.
155. The reason for the strength of this demand is that, for those households unable to access market housing to buy, and who do not qualify for affordable housing, private rented housing is the only remaining option.
156. Given the trends identified in this HNA, Whittlesey should seek build to rent (BTR) development, which may include an element of affordable housing and is likely to be brought forward by specialist developers funded by institutional investors. This will provide accommodation of consistently higher quality than is available through the traditional small private landlord.
157. As we have seen, the Housing White Paper proposed a number of modifications to the definition of affordable housing for planning purposes. One of these is Affordable Private Rent Housing (APRH), this is housing made available for rent at a level which is at least 20 per cent below local market rent. It is envisaged such housing would be delivered as part of BTR schemes.
158. Bringing the evidence together on housing tenure, as we have seen, affordable market housing in Fenland is affordable to households with incomes around the median, and above. For this reason, Discounted Market Sale Housing (DMSH) does offer a realistic means of those on incomes below the mean to access the property market. We would therefore recommend DMSH form part of the AH quota within the NPA, with policy seeking to fulfil the Government's 10% policy expectation. For Affordable Rented Dwellings to expand the choice of housing available to residents in the NPA, rent levels should be set substantially below the maximum of 80% so as to avoid competition with intermediate products; this will encourage 'true affordability,' providing a route to housing for households on lower quartile incomes. We note, however, that policy of this kind can only be devised where it does not threaten viability.
159. The operation of the market is the best means of addressing the demand for different types of housing for sale. PRS will continue to provide a growing role in satisfying housing need in the NPA, given the shortage of shared equity stock and overall affordability of for-sale homes. As a result, Whittlesey should seek build to rent (BTR) development, which may include an element of affordable housing in the form of Affordable Private Rent Housing (APRH).

### 3.6 Type

160. As identified earlier in this study, PPG recommends a consideration of the existing housing provision and its suitability, having regard for demographic shifts in age and household composition as well as affordability, to address future as well as current community need. For this reason, we start with a consideration of the existing housing stock.

<sup>28</sup> SHMA, Section 6.3, page 12



161. In the table below we present the range of dwelling types in the NPA; the overwhelming majority of dwellings are houses of the three principal types. There are, however a number of flats in the town.

**Table 18: Accommodation type (households) in Whittlesey, 2011**

Dwelling type		Whittlesey	Fenland	England
Whole house or bungalow	Detached	49.1%	45.6%	22.4%
	Semi-detached	28.5%	28.9%	31.2%
	Terraced	14.9%	15.8%	24.5%
Flat, maisonette or apartment	Purpose-built block of flats or tenement	5.2%	7.0%	16.4%
	Parts of a converted or shared house	1.1%	1.1%	3.8%
	In commercial building	0.9%	0.8%	1.0%

Source: Census 2011, AECOM Calculations

162. Turning to size of dwellings, Tables 20 and 21 below shows the range of dwelling sizes in Whittlesey and how the overall housing stock has changed in Whittlesey in the decade between the 2001 and 2011 Censuses. Firstly we note that 76% of all dwellings have five rooms or more in 2011. Bearing in mind the Market Segments analysis earlier, this suggests the housing stock is broadly aligned with need.

**Table 19: size of dwellings in Whittlesey**

Number of Rooms	2001	2001	2011	2011
	Whittlesey	Fenland	Whittlesey	Fenland
1 Room	10	97	11	95
2 Rooms	89	595	83	752
3 Rooms	319	2498	443	3018
4 Rooms	1224	7814	1133	7463
5 Rooms	1708	9882	1689	10450
6 Rooms	1290	7193	1536	8420
7 Rooms	578	3320	926	4539
8 Rooms or more	693	3793	554	2916
9 Rooms or more			543	2967

Source: Census 2011, AECOM Calculations

163. Table 21 below, which expresses Table 20 above as percentages, brings out the changes that have taken place in dwelling size between the Censuses. From this we can see there has been a sharp increase in the number of larger family homes of 6 and 7 rooms, and a modest fall in the number of homes of 4 rooms.

**Table 20: Rates of change in number of rooms per household in Whittlesey, 2001-2011**

Number of Rooms	Whittlesey	Fenland	England
1 Room	10.0%	-2.1%	-5.2%
2 Rooms	-6.7%	26.4%	24.2%
3 Rooms	38.9%	20.8%	20.4%
4 Rooms	-7.4%	-4.5%	3.5%
5 Rooms	-1.1%	5.7%	-1.8%
6 Rooms	19.1%	17.1%	2.1%
7 Rooms	60.2%	36.7%	17.9%
8 Rooms or more	58.3%	55.1%	29.8%

Source: Census 2011, AECOM Calculations



164. SHMA 2013 is explicit in the sizes of dwellings required at the sub-regional level. Below we reproduce Tables 4 and 5 from this document<sup>29</sup>. The table below puts forward recommendations for dwelling mix for new homes built between 2011 and 2031, based on a continuation of past trends from 1991 to 2010. This also serves to highlight the different dwelling sizes needed within each district.<sup>30</sup>

**Table 21: Dwelling mix: numbers from 'How Many Homes'**

	Bedsit	Flat/house with one bedroom	Flat/house 2 bedrooms	Flat/house with 2 bedroom and 2 reception rooms, or 3 bedrooms and 1 reception room	Flat/house with 3 bedrooms and 2 reception rooms	House with 3 bedrooms and 3 reception rooms or 4 bedrooms and 2 reception rooms	House with 4, 5 or more bedrooms
Cambridge	52	502	1,382	1,661	2,044	1,928	1,785
East Cambridgeshire	46	240	1,370	3,095	3,021	1,996	2,581
Fenland	57	409	1,843	4,104	3,478	2,148	1,368
Huntingdonshire	124	561	2,612	4,253	3,856	2,544	2,264
South Cambridgeshire	72	390	1,819	4,714	3,948	3,041	4,216
Forest Heath	73	214	893	2,445	1,738	951	844
St Edmundsbury	153	399	1,586	2,746	2,672	1,791	1,657
Overall number	577	2,715	11,505	23,018	20,757	14,399	14,715

Source: *How Many Homes*

**Table 22: Dwelling mix required: converting numbers into percentages**

	Bedsit	Flat/house with one bedroom	Flat/house 2 bedrooms	Flat/house with 2 bedroom and 2 reception rooms, or 3 bedrooms and 1 reception room	Flat/house with 3 bedrooms and 2 reception rooms	House with 3 bedrooms and 3 reception rooms or 4 bedrooms and 2 reception rooms	House with 4, 5 or more bedrooms
Cambridge	1%	5%	15%	18%	22%	21%	19%
East Cambridgeshire	0%	2%	11%	25%	24%	16%	21%
Fenland	0%	3%	14%	31%	26%	16%	10%
Huntingdonshire	1%	3%	16%	26%	24%	16%	14%
South Cambridgeshire	0%	2%	10%	26%	22%	17%	23%
Forest Heath	1%	3%	12%	34%	24%	13%	12%
St Edmundsbury	1%	4%	14%	25%	24%	16%	15%
Overall %	1%	3%	13%	26%	24%	16%	17%

Source: *How Many Homes*

165. From this data, it is possible to discern the recommended balance of sizes of dwellings moving forward. The SHMA suggests that 42% of new dwellings in Fenland should be dwellings of 5 rooms or more. This is indicative of the family orientation of the neighbourhood we have identified elsewhere in this study.
166. Notwithstanding, this indicates that smaller homes of 4 rooms or less should constitute 58% of all new dwellings supplied.
167. In terms of the types of dwellings suited to the community, this is in many ways a matter firstly of taste as well as what is best suited to the character of the NPA. For this reason, we rely principally on the findings from the Community Survey and interviews with estate agents working in the area. These pin-point demand for dwellings that is specific to Whittlesey.
168. Finally, given the need for smaller dwellings, flats should not be discounted from the dwelling types brought forward.
169. Bringing together our analysis as regards types and sizes of dwellings, we note that current housing stock, which exhibits a bias towards larger dwellings, is broadly in line with current demand, as revealed in the market segments analysis. This reflects its established orientation towards family life. The change in the housing stock since the Census shows an increase in larger homes; this reflects demographic shifts, seen over the same

<sup>29</sup> SHMA 2013, Section 14.2, page 8

<sup>30</sup> SHMA 2013, Section 14.2, page 9

period, towards greater numbers of adults of parental age, together with a commensurate increase in 16-24 year olds. This will be a result of families seeking affordable dwellings beyond the higher price zones of South Cambridge and the outskirts of London itself.

170. An additional observation from demographic shifts is that the phenomenon of the aging population will affect Whittlesey more acutely than the surrounding area; for this reason, the district level proscriptions set out in the SHMA should be challenged. In Whittlesey a greater proportion of new dwellings should be smaller homes of 2 and 3 rooms to address demand from the increasing numbers of solo and couple households in the town.

### 3.7 RQ.6. What provision should be made for retirees and the elderly?

#### 3.7.1 Sheltered and extra-care housing

171. As we have seen, given the significant forecast increases in people aged 75+, it is appropriate for policy to provide support for a significant quantum of sheltered<sup>31</sup> and extra care<sup>32</sup> housing as part of the delivery of new housing. Table 21 below identifies the growth in the population of over 75s between 2011 and 2031.

**Table 23: Change in the population of over 75s between 2011 and 2031**

Age band	2011			2031		
	Population (Whittlesey)	Population (Fenland)	Percentage of population	Population (Fenland)	Population (Whittlesey)	Projected 75+ population (Whittlesey)
All ages	16,058	95,262	17%	109,648	18,483	
75+	1,500		9%	15,826	14%	2668

Source: 2014-based Sub-national population projections, DCLG and Census 2011 (ONS) AECOM calculations

172. In arriving at an appropriate level of housing for older people of different types, we have applied the Housing Learning and Improvement Network's suggested numbers per 1,000 of the 75+ population<sup>33</sup>. The table above, shows an estimate of the increase in the numbers of older people aged 75+ of 59 (185-126). This will result, over the plan period, in a need for:

- additional conventional sheltered housing units = 60 x 6% = 4 (rounded);
- additional leasehold sheltered housing units = 120 x 6% = 8 (rounded);
- additional 'enhanced' sheltered units, split 50:50 between those for rent and those for sale = 20 x 6% = 1 (rounded);

<sup>31</sup> Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bedroomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden. Source: <http://www.housingcare.org/jargon-sheltered-housing.aspx> (accessed 11/04/17)

<sup>32</sup> New forms of sheltered housing and retirement housing have been pioneered in recent years, to cater for older people who are becoming frailer and less able to do everything for themselves. Extra Care Housing is housing designed with the needs of frailer older people in mind and with varying levels of care and support available on site. People who live in Extra Care Housing have their own self-contained homes, their own front doors and a legal right to occupy the property. Extra Care Housing is also known as very or enhanced sheltered housing, assisted living, or simply as 'housing with care'. It comes in many built forms, including blocks of flats, bungalow estates and retirement villages. It is a popular choice among older people because it can sometimes provide an alternative to a care home. In addition to the communal facilities often found in sheltered housing (residents' lounge, guest suite, laundry), Extra Care often includes a restaurant or dining room, health & fitness facilities, hobby rooms and even computer rooms. Domestic support and personal care are available, usually provided by on-site staff. Properties can be rented, owned or part owned/part rented. There is a limited (though increasing) amount of Extra Care Housing in most areas and most providers set eligibility criteria which prospective residents have to meet. <http://www.housingcare.org/jargon-extra-care-housing.aspx> (accessed 11/04/17)

<sup>33</sup> Housing LIN (2011) Strategic Housing for Older People: Planning, designing and delivering housing that older people want, available online at: [http://www.housinglin.org.uk/\\_library/Resources/Housing/SHOP/SHOPResourcePack.pdf](http://www.housinglin.org.uk/_library/Resources/Housing/SHOP/SHOPResourcePack.pdf)

- additional extra care housing units for rent =  $15 \times 6\% = 1$  (rounded);
- additional extra care housing units for sale =  $30 \times 6\% = 2$  (rounded); and
- additional specialist dementia care homes =  $6 \times 6\% = 1$  (rounded).

### 3.7.2 Retirement villages

173. Projects that involve the delivery of multiple homes satisfy the desire on the part of many older people to live in an environment with people facing similar challenges; retirement villages are often a cost-effective means of delivering sheltered and extra care housing together with the facilities and services these settlements imply. Given the numbers of units that result from the LIN analysis, it would be appropriate to consider this approach to the delivery of housing for the elderly in Whittlesey.
174. This is in line with community need as understood by WTC who comment, 'there is a demand for self-catered independent good quality safe and secure housing where similar minded individuals can live as a community with access to facilities, especially reasonable shopping, transport, doctors, opticians and dentists.'
175. Such schemes should be explored through joint working with FDC and other parishes to identify sites that could address collective need.

### 3.7.3 Senior Co-housing

176. Co-housing has been identified as being particularly suited to the needs of older residents. It offers a way for a group of people with similar interests and needs to come together to create an environment suited specifically to their requirements. Moreover, it can be designed to help address one of the most important issues for older people: isolation and loneliness. A number of successful case studies exist of both projects developed specifically with the needs of older people in mind, and others that encourage multi-generational housing, such as Featherstone Lodge in Forest Hill<sup>34</sup> and LILAC in Leeds<sup>35</sup>. In the first example, the design facilitated the creation of public areas that encouraged social interaction between members of the community, moreover, a 'common house' was built in the grounds of the scheme that provided a shared space in which people could come together for meeting and shared activities.

### 3.7.4 Multi-generational homes

177. Multi-generational living has been identified as a possible solution not only for older people, but all generations where it makes financial sense to share accommodation, particularly younger people who are struggling to set up their own households. This gives rise not only to designs for new homes, but conversions to existing dwellings, introducing internal subdivisions and peripheral extensions to create internal layouts that balance the private needs of different generations with the benefits of over-lapping, shared communal spaces.<sup>36</sup>
178. The phenomenon of the aging population has an up-side; with increases in the quality of health-care, older people are able to live active lives for longer, the so-called 'third age' after retirement when people still want to live fully active lives. Within a household or community where tasks and facilities are shared, they are in a good position to take on both voluntary and paid work, for example looking after grandchildren or taking care of the elderly.

### 3.7.5 Lifetime Homes

179. Many local authorities incorporate policy into their Local Plans that a proportion of new homes should be built according to 'lifetime homes' principles; these are ordinary homes incorporating a number of design criteria that can be universally applied to new homes at minimal cost, for example parking that makes getting in and out of the car as simple and convenient as possible and ensuring movement in hallways and through doorways should be as convenient to the widest range of people, including those using mobility aids or wheelchairs, and those moving furniture or other objects.<sup>37</sup>

<sup>34</sup> <http://www.featherstonecohousing.co.uk/> (visited 12/04/17)

<sup>35</sup> <http://www.lilac.coop/> (visited 12/04/17)

<sup>36</sup> RIBA, *Silver Linings, The Active Third Age and the City*, Page 17-18

<sup>37</sup> <http://www.lifetimehomes.org.uk/pages/about-us.html>

### 3.7.6 Right-sizing

180. As we have identified earlier, there is a need for a greater number of the type of dwellings that facilitate 'right-sizing' for older people. It is important to note, this does not necessarily imply moving to a smaller home. Many older people have the wealth (and the choice that comes with it) to create a home suited to having visitors and accommodating care staff, who may need to make over-night stays.
181. For this reason, it is important to recognise that different ages have different needs; thus in the provision of housing, choice is critical, catering for those with relatively modest requirements, to those who are more dependent on help. The provision of choice that responds to need is part of creating a smoothly operating local housing market in which older people are able to move out of family homes when they wish, thus freeing up these properties for others.<sup>38</sup>

### 3.7.7 Planning flexibility

182. Planning policy can be mobilized to help properties to become more adaptable in the context of an increasingly elderly population. This includes allowing the conversion of conventional dwellings or groups of dwellings (for example terraced housing) into multiple homes, particularly where additional features are included to address 'lifetime homes' criteria and to encourage interaction with the wider community. This can incorporate bigger community open space as a result of joining up different gardens.<sup>39</sup> This is not dissimilar to the practice of 'alley-gating' where alleyways between the backs of terraced housing have been gated off, and turned into shared community spaces.

### 3.7.8 Lifetime neighbourhoods

183. Creating an environment in which older people feel both welcome and comfortable does not end at the front door. Research exists that considers life-time neighbourhoods, in which the public realm is designed to address the needs of older people, and activates the benefits they can bring in supporting local businesses and encouraging improved public realm for everyone, for example providing more greenery and more walkable, better connected places.
184. Given the expanded role of neighbourhood planning around design outlined in the Housing White Paper of 2017<sup>40</sup>, a compelling notion is that of 'the amplification of impact of micro-environmental features' to describe that particular way in which we become more sensitive to the ordinary, smallest features of urban space as we age. This places a particular emphasis on care and reflection in how we design, for example paths and public seating; this, in turn, calls for the participation of older people in the process of design.
185. Design approaches exist that provide a starting point for locally informed policy development in this area, these include Manchester's Design for Access 2 and the work of Inclusive Design for Getting Outdoors (IDGO); IDGO have identified material features that make everyday negotiation of urban space easier for older people; these include wide and flat tarmac footways, easy transition level changes, clear, simple and visible signage, frequent warm and supportive seating and well-maintained, safe and open toilets.<sup>41</sup>
186. In addition, the notion of 'pensioner play-grounds,' 'green-gyms,' community gardens and various forms of guerrilla gardening (for example the Edible Todmorden project) encourage active use of public space and facilities on the part of an older demographic.

### 3.7.9 Age-friendliness

187. Since the millennium policy at the international level has been directed towards a more holistic appreciation of what an 'age-friendly' urban environment looks like. It has been remarked this should extend beyond physical installations, such as public seating and access to WCs, but embrace means mobilising civic agency among older group to forestall incipient marginalisation, enabling them to continue to make a full and active contribution to community life.<sup>42</sup>
188. In 2006 the World Health Organisation (WHO) began developing the 'Age-Friendly Cities' movement, now a worldwide network of over 200 member cities around the world. They have produced a guide that offers a way

<sup>38</sup> Housing LIN, New Approaches to Housing for Older People, June 2014, page 6

<sup>39</sup> Gobber, S, A Bright Grey Future, Urban Design Group Journal, Spring 2016, page 29

<sup>40</sup> HMG, Fixing our broken housing market, page 29

<sup>41</sup> RIBA/Age UK, An Alternative Age-Friendly Handbook, page 54/55

<sup>42</sup> RIBA/Age UK, An Alternative Age-Friendly Handbook, page 16

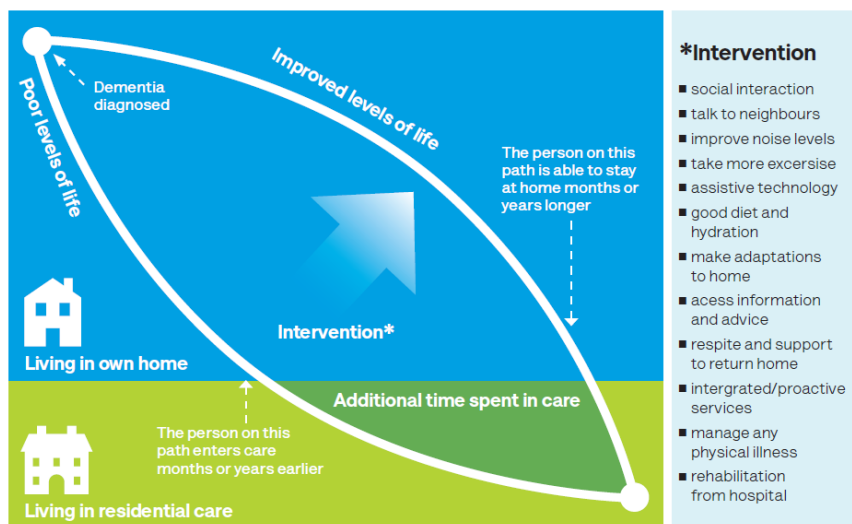
of analysing the city from the perspective of older people, using a framework of inter-related domains: transportation, housing, social participation, respect and social inclusion, communication and information, civic participation and employment, health and community services.

- 189. Considering the housing domain, the WHO study identifies a check list of attributes necessary to foster a sense of belonging and well-being among older people. In addition to affordability and designing accommodation with the needs of older people in mind, the adaptability of dwellings is important, for example their capacity to accommodate chair-lifts that enable older people to continue to live in two-storey homes<sup>43</sup>.
- 190. The WHO also identified access to services, particularly those that become increasingly important as people get older, such as places of worship and community centres.<sup>44</sup> Moreover, optimising well-being has much to do with being able to maintain links with existing networks, which is best achieved by enabling people to remain in their existing communities for as long as possible. In the Australian city of Melville small clusters of senior's housing with small gardens are made available throughout the city, so that older people are not isolated from the community and particularly from children.<sup>45</sup>

### 3.7.10 Housing for people with Dementia

- 191. Enabling people with dementia to live in their own homes for longer is critical to their quality of life as a result of the familiarity of surroundings and the help with retaining memories this facilitates<sup>46</sup>. The challenge with this is two-fold; firstly the lack of appropriate adaptations in properties and, secondly, the support required to ensure a home is safe and suitable.
- 192. Selwood Housing in the South West has pioneered approaches that help overcome these, for example the installation of property exit sensors to inform a monitoring centre when tenants leave their home and then not return within a pre-determined time.
- 193. In figure 18 below we reproduce a chart showing the impact that early and appropriate intervention can have on the prospect of people with dementia remaining in their own home for longer.

Figure 16: Dementia care chart



Source: Dementia Services Development Centre, 2013

### 3.7.11 The role of the Local Authority

- 194. As suggested above, it is appropriate for the neighbourhood group to work closely with the LPA to develop policy and approaches to addressing the need for housing for elderly people in the area. The LPA is under an obligation through national policy to address the needs of older people.<sup>47</sup> It is therefore appropriate they should

<sup>43</sup> World Health Organisation: Global age-friendly cities: a guide, page 32

<sup>44</sup> Ibid, page 33

<sup>45</sup> Ibid, page 35

<sup>46</sup> Alzheimer's Society, Dementia-friendly housing charter, page 13

<sup>47</sup> NPPF, para 50

play the strategic role in co-ordinating new efforts by housing providers, adult care services, primary care and health trusts, private and third sector organisations to meet the housing needs of older people across the district.

## Market Signals

195. The PPG highlights the importance of taking market signals into account when assessing housing need, given they provide an indication of the balance between demand and supply. This is particularly important to consider given the significant and well-documented changes in the housing market over recent years, which were exacerbated by the economic downturn and subsequent issues in obtaining mortgage finance.

196. The PPG states:

*The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices rising faster than the national/local average may well indicate particular market undersupply relative to demand.<sup>48</sup>*

197. These market signals relate to trends discernable within the housing market, and broader economic trends that have an impact on the housing market.

198. The PPG goes on to assert that where there is evidence of an imbalance in supply and demand, an uplift in planned housing numbers – compared to those derived solely from household projections – is required in order to increase the supply of housing to meet demand and tackle affordability issues:

*This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.*

*In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.<sup>49</sup>*

### 3.8 Employment and commuting trends

199. Local employment trends can greatly influence housing needs as employment opportunities can stimulate demand in the plan area. It is therefore important to establish the employment sphere of influence experienced by the residents of the Whittlesey NPA.

200. The Greater Cambridge and Greater Peterborough Economic Area is characterised by its internationally competitive and nationally significant industries<sup>50</sup>. The table below shows that Whittlesey is similar to Fenland as a whole in terms of employment activity, although the overall employment rate is higher in the town than for the district as a whole.

<sup>48</sup> [http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/#paragraph\\_019](http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/#paragraph_019)

<sup>49</sup> [http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/#paragraph\\_020](http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/#paragraph_020)

<sup>50</sup> LEPSEP14, pp.2



**Table 24: Economic activity in Whittlesey, 2011**

Economic category		Whittlesey	Fenland	England
Economically active	Total	72.3%	69.1%	69.9%
	Employee: Full-time	41.5%	39.4%	13.7%
	Employee: Part-time	15.0%	14.0%	38.6%
	Self-employed	9.8%	9.3%	9.8%
	Unemployed	3.6%	4.2%	4.4%
	Full-time student	2.4%	2.1%	3.4%
Economically inactive	Total	27.7%	30.9%	30.1%
	Retired	16.7%	17.1%	13.7%
	Student	2.8%	3.1%	5.8%
	Looking after home or family	3.6%	4.3%	4.4%
	Long-term sick or disabled	3.2%	4.5%	4.1%
	Other	1.5%	2.0%	2.2%

Source: ONS Census 2011, AECOM Calculations

201. The 2014 Fenland Local Plan notes the “close functional relationship” between Whittlesey and Peterborough in terms of employment, such that it is “an increasingly popular settlement for out-commuters”<sup>51</sup> with 40% of the population commuting out of the district for work.<sup>52</sup> Given that “the Greater Peterborough Area has “facilitated significant additional growth in commercial space” in recent years<sup>53</sup>, it is likely that demand for housing in Whittlesey will increase as a result.
202. Furthermore the Fenland District Council’s 2013 Employment Evidence Base further clarifies that “at Whittlesey...journeys are to destinations outside of the district such as to Peterborough and Cambridge.”<sup>54</sup> Cambridge, which is just one hour by train and car from Whittlesey, is projected to see the greatest increase in jobs in the wider economic area, fully 27% by 2031.<sup>55</sup> Such employment growth in Cambridge is likely to bring with it an increase in demand for housing at Whittlesey in future.
203. Indeed the 2014 City Deal for Greater Cambridge “will bring up to £500 million pounds of grant funding to invest in transport infrastructure over 15 to 20 years from 2015/16”<sup>56</sup> in the region, and any improved frequencies on rural routes could “markedly improve journey time from towns such as...Whittlesey...to London”.<sup>57</sup> Such investment would also be expected to generate further additional demand for housing in Whittlesey given its connections to London, and its inclusion in the London-Standed-Cambridge-Peterborough Growth Area.<sup>58</sup>
204. Employment in Whittlesey is not solely focused on out commuting, and a number of industrial sites, including Forterra and McCain Foods, support employment in the town. These form “mature and well-established sector clusters of businesses relating to construction, food & drink, manufacturing and storage and distribution”<sup>59</sup>. Whilst the Strategic Market Assessment for the Cambridgeshire region suggests job growth of 5,000 in Fenland by 2031/2036 as shown in the table below, the Fenland District Council Economic Development Strategy suggests a higher level of jobs growth of 7,200 by 2031.<sup>60</sup> This additional locally projected employment growth, which has not

<sup>51</sup> LP14, pp. 49

<sup>52</sup> LP14, pp.7

<sup>53</sup> LEPSEP14, pp.53

<sup>54</sup> LEPSEP14, pp.2

<sup>55</sup> SHMA13, Section 12, pp. 27

<sup>56</sup> LEPSEP14, pp.32

<sup>57</sup> LEPSEP14, pp.15

<sup>58</sup> FEDS12, pp. 10

<sup>59</sup> FEDS12, pp. 11

<sup>60</sup> FEDS12, pp. 7



been taken into account in the most recent housing projections, will almost certainly increase the need for housing in Whittlesey.

**Table 25: Indicative Job Numbers from 2031/2036**

	Jobs 2011	Jobs 2031/2036	Jobs change 2011 to 2031/2036	% increase 2011 to 2031/2036
Cambridge	98,000	120,000	22,000	22%
East Cambridgeshire	29,000	36,000	7,000	24%
Fenland	35,000	40,000	5,000	14%
Huntingdonshire to 2031	81,000	96,000	15,000	19%
Huntingdonshire to 2036	81,000	100,000	19,000	23%
South Cambridgeshire	82,000	104,000	22,000	27%
Cambridgeshire to 2031	325,000	396,000	71,000	22%
Cambridgeshire incl. HDC to 2036	325,000	400,000	75,000	23%
Forest Heath	28,000	31,000	3,000	11%
St Edmundsbury	68,000	75,000	7,000	10%
Housing sub-region to 2031	421,000	502,000	81,000	19%
Housing sub-region incl. HDC to 2036	421,000	506,000	85,000	20%

Source:

Census 2001/11/ SHMA13

205. The Figure 17 outlines potential growth sectors for Fenland District. Although “there may be employment decline in some manufacturing sectors going forward”<sup>61</sup>, it is reasonable to assume that given the intensity of land use of the more mature industrial clusters, and the less space intensive needs of growing service sectors shown in the figure below, there will be adequate existing employment sites for the foreseeable future. This conclusion is difficult to establish using Fenland District Council’s 2013 Employment Evidence as the document does not assess the number and size of existing employment sites, but only additions and subtractions to employment land through the planning process in the period investigated. Nevertheless, the scale of existing employment sites suggested by the presence of certain mature clusters has the potential to accommodate significant job growth in Fenland, thus leading to additional demands for housing in Whittlesey.

**Figure 17: Potential growth sectors in Fenland District**



Source: EDS12

### 3.9 Housing Transactions: Prices

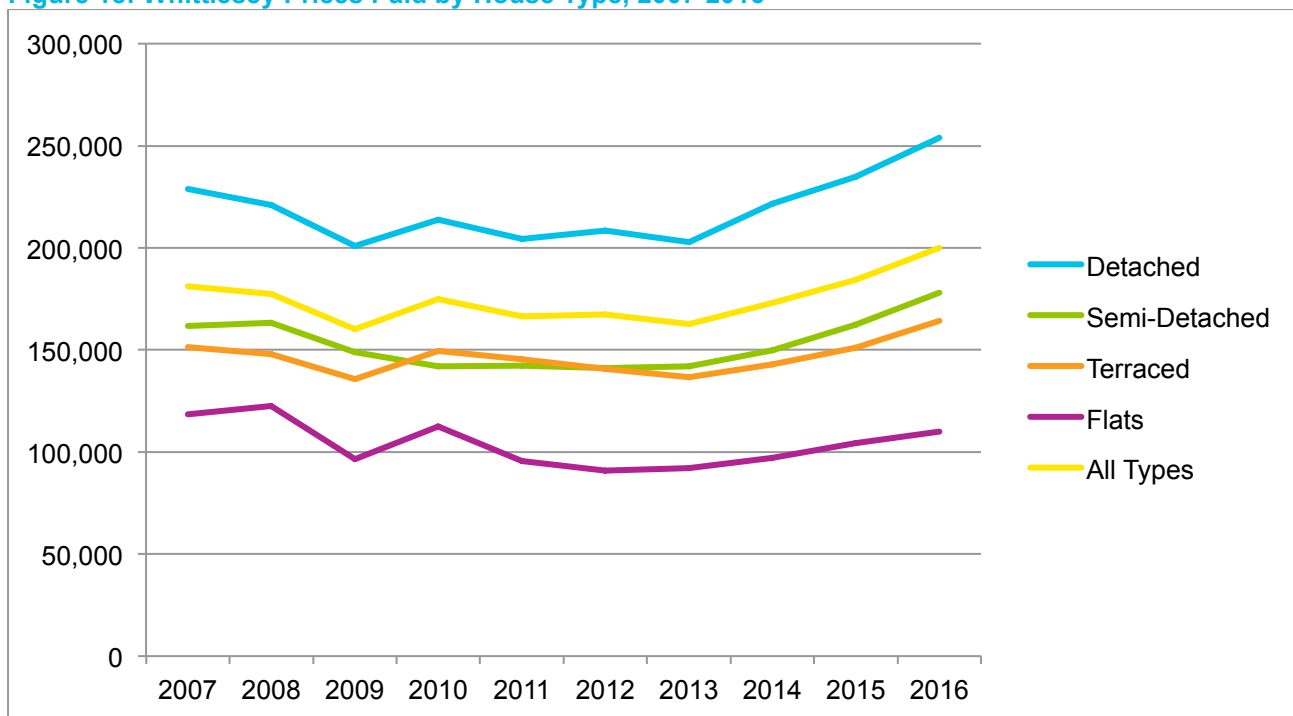
206. The PPG advises that house prices should be used as an indication of the strength of demand for housing, and the adequacy of supply to meet that demand. To assess the housing market in the Whittlesey NPA data from the Land Registry was analysed. This data provides price paid, housing type and date of transaction information which allows housing market trends to be identified. Data was downloaded for the period of January 2007 to December 2016 and is presented annually in the Figure 18. To replicate the NPA area, relevant post code data was filtered down to the parish level, such that only post-codes within the parish were included in the selection of Land Registry Data used for the analysis.

207. Figure 20 and Table 27 below indicate that whilst detached, semi-detached and terraced housing has recovered to their pre-recession prices on average, this has only occurred very recently, and indeed flats have not recovered to

<sup>61</sup> FEDS12, pp. 11

their pre-recession average price paid. Furthermore, Land Registry Price Paid data is not adjusted for inflation, and therefore these figures suggest even weaker price recovery than may at first appear.

**Figure 18: Whittlesey Prices Paid by House Type, 2007-2016**



Source: Land Registry PPD, AECOM Calculations

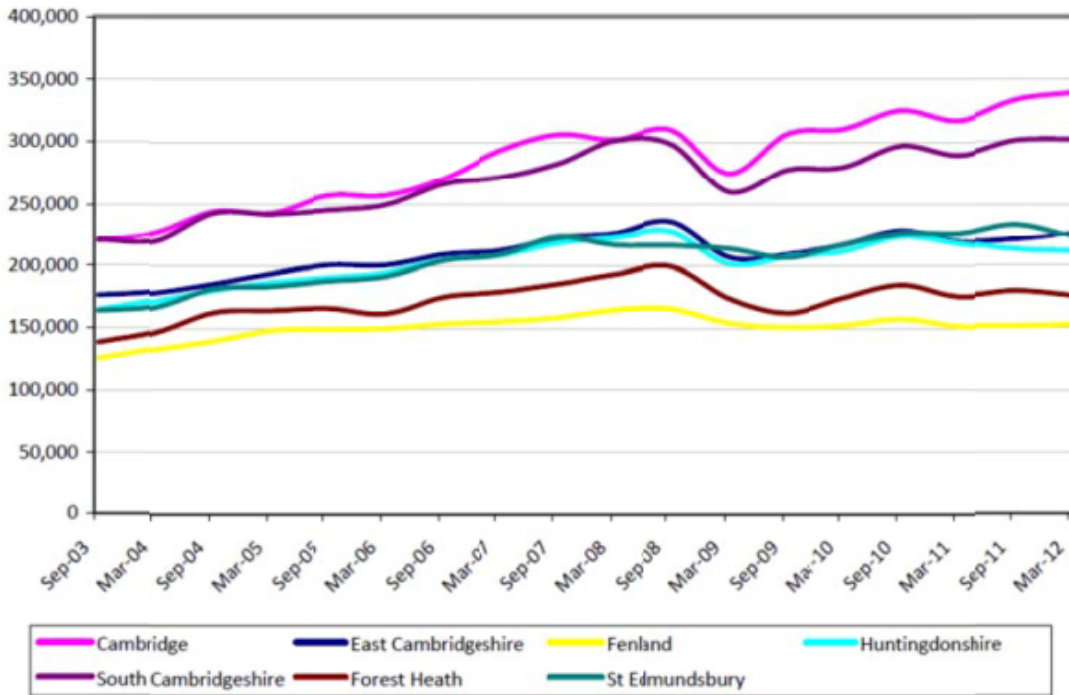
**Table 26: Whittlesey Prices Paid by House Type, 2007-2016**

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Detached	228,939	220,898	200,875	213,901	204,238	208,500	202,977	221,629	234,857	254,070
Semi-Detached	161,667	163,461	148,811	141,893	142,225	141,121	141,828	149,679	162,282	178,037
Terraced	151,340	148,025	135,628	149,423	145,303	140,738	136,777	142,893	151,008	164,378
Flats	118,517	122,393	96,513	112,348	95,688	90,880	92,220	97,189	104,362	110,102
All Types	181,169	177,419	160,154	174,765	166,567	167,328	162,588	173,164	184,453	199,926

Source: Land Registry PPD, AECOM Calculations

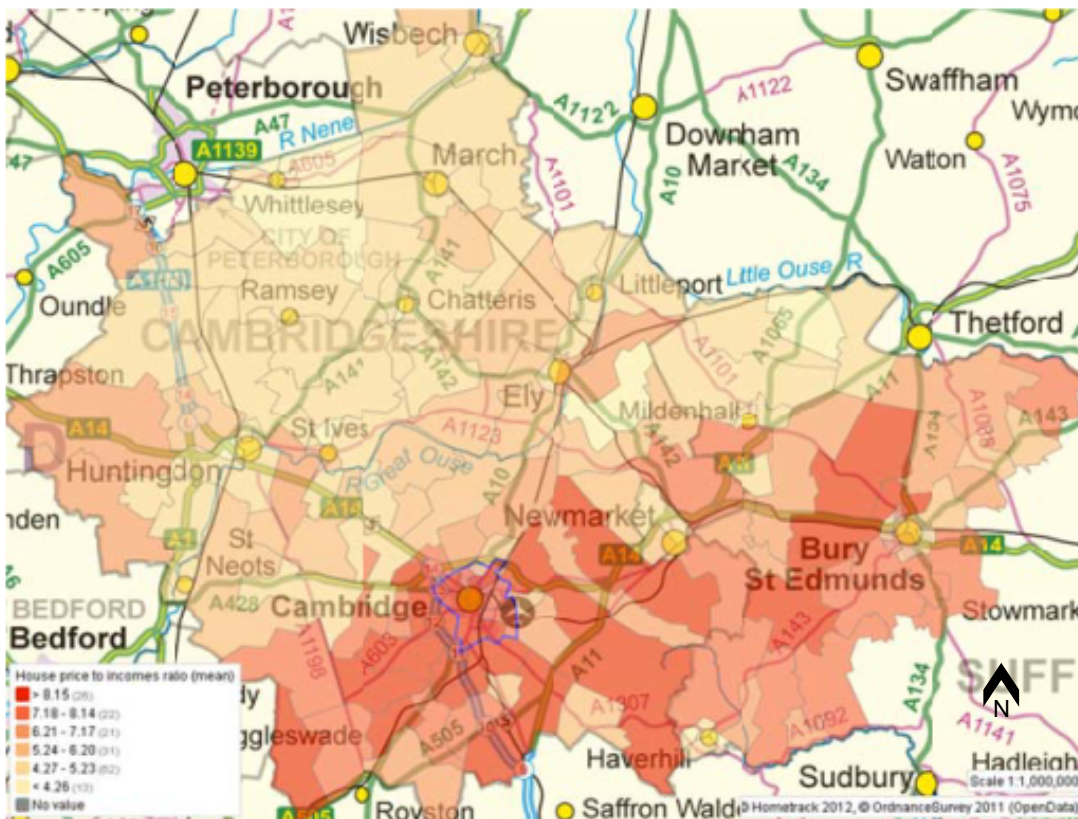
208. Indeed, the relative lack of demand in the NPA indicated above is reflected in Figure 21 below, which shows the average prices for individual districts over time in the wider Strategic Housing Market Area of Cambridgeshire . Fenland can be seen to significantly less expensive other districts, and therefore also more affordable, than the rest of the housing market area. This is demonstrated in Figure 22, which shows the mean house price to income ratio by ward for the area, and shows that Fenland and particularly Whittlesey is one of the most affordable wards in the wider housing market area.

Figure 19: Average prices for individual districts over time in the housing market sub-areas



Source: Land Registry PPD/SHMA 2009

Figure 20: Mean house price to income ratio by ward



Source: Hometrack March 2012, OANFE

209. However, prices in Whittlesey are actually higher than the average for Fenland as a whole, although they have grown less over the period under consideration than those of the district. This growth is demonstrated in the table 28 below. The relatively higher price of housing in Whittlesey compared to the rest of Fenland is likely due to its proximity to Peterborough, and this suggest that in price terms, Whittlesey's housing market is more similar to the rest of the housing market area, rather than to Fenland's. Indeed, prices in Whittlesey shown in the table below appear more similar to those of Huntingdonshire than to the average for Fenland itself. The significant drop seen in the price of flats is not considered significant, given that these made up just 7% of all sales over the period.

**Table 27: Price comparison for January 2007 and December 2016, Whittlesey and Fenland**

	Prices in January 2007		Prices in December 2016		Percentage Growth in Prices	
	Whittlesey	Fenland	Whittlesey	Fenland	Whittlesey	Fenland
Detached	£228,939	£183,120	£254,070	£230,409	11%	26%
Semi-Detached	£161,667	£127,327	£178,037	£154,522	10%	21%
Terraced	£151,340	£101,053	£164,378	£119,313	9%	18%
Flats	£118,517	£77,726	£110,102	£80,800	-7%	4%
All Types	£181,169	£141,510	£199,926	£172,089	10%	22%

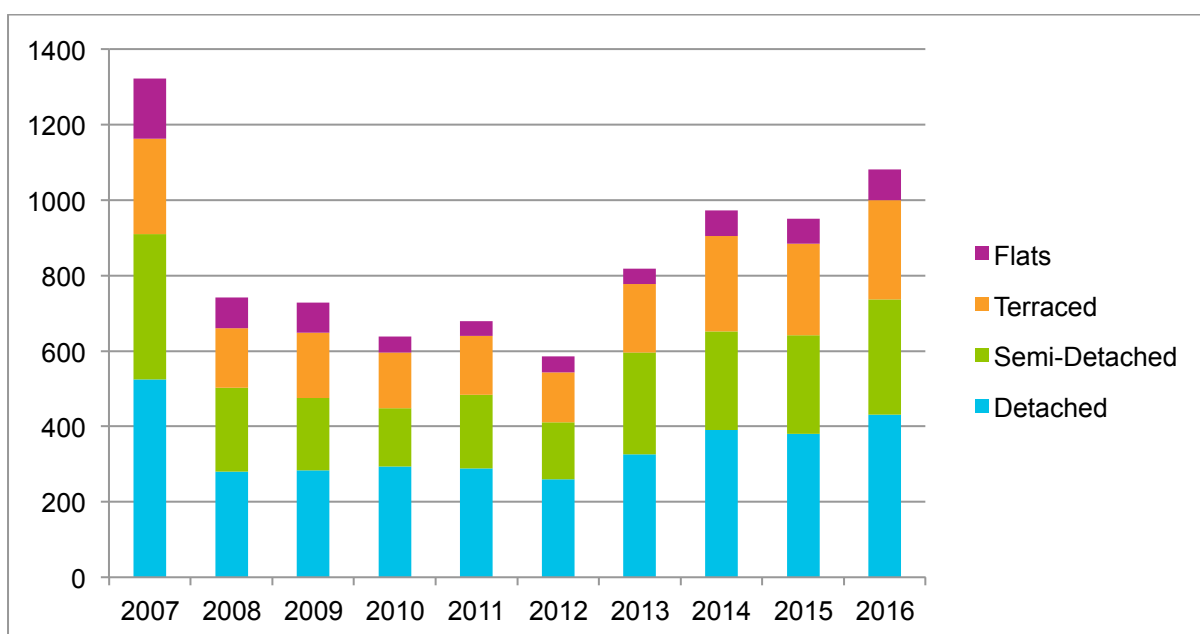
Source: Land Registry PPD, AECOM Calculations

210. In summary, although price growth in Whittlesey has been relatively low over the last 10 years compared with Fenland, mainly as a result of the national recession, this has been from a higher base. Given its proximity to Peterborough, and its similarity to other, higher priced and higher demand areas of the wider housing market area such as Huntingdonshire, it is likely that demand is likely to further recover and increase in future.

### 3.10 Housing Transactions: Volume

211. Figure 21 below depicts the relative proportions of different housing typologies sold in Whittlesey between 2007 and 2016. This graph represents the same Land Registry data discussed in the previous section separated out by housing type. This graph shows the effects of the national recession, and in particular that in spite of the double dip seen elsewhere in the country, housing transactions in Whittlesey did not recover in the interim between the two dips, indicating the housing market's relative weakness. Indeed, it is also clear that transaction volumes had not, in 2016, returned to pre-recession levels, having regained less than half of the overall drop.

**Figure 21: Sales volumes of different housing types in Whittlesey, 2007-2016**



Source: Land Registry PPD, AECOM Calculations

212. Another approach to benchmarking whether sales volumes represent a clear market signal indicating inflated or depressed demand across different housing types is to compare the proportion of sales of each type of housing (excluding any new builds, which would introduce supply side factors) with the proportion of the existing housing stock that falls into each category. This allows conclusions to be drawn about whether the sale of homes of each type is occurring proportional to their availability, or there whether there is unmet demand.
213. This comparison is presented in the table below, with figures for the housing stock in Fenland District as a whole presented alongside for reference. The table shows clearly that whilst the percentage of sales and stock are roughly the same for semi-detached houses and flats, fewer detached houses are being sold than are represented in the existing stock, whilst more terraced housing is being sold than are in the existing stock. This suggests that there is an increased demand for terraced housing relative to supply, versus a decreased demand for detached houses. Indeed, in both cases, this conclusion is only reiterated by the existing stock within the district as a whole, which both point to there being less demand for detached housing than would be expected given its availability, and more demand for terraced housing given its availability.

**Table 28: Sales volumes versus stock of different housing types in Whittlesey and Fenland**

	SALES Whittlesey	STOCK Whittlesey	STOCK Fenland
Detached	42%	49%	46%
Semi-Detached	29%	28%	29%
Terraced	22%	15%	16%
Flats	7%	7%	7%

Source: Census 2001/2011, Land Registry PPD, AECOM Calculations

### 3.11 Migration

214. Although Whittlesey has experienced population growth of 12% between 2001 and 2011, as shown in the table below, this is not seen as unusual when set against population growth of 14% in the same period in Fenland as a whole. However, the percentage of people born outside of the UK is very low in Whittlesey, less than 5%, as shown in the table below, and this is less than the figure for Fenland as a whole, approximately 9%, and furthermore, of those born outside of the United Kingdom, fully two thirds, 66%, have been living in Whittlesey for more than 10 years. Therefore, migration is not seen as a significant driver of increased housing demand in Whittlesey.

**Table 29: Population by Age Group, 2001, 2011**

Age group	2001		2011	
	Whittlesey	Fenland	Whittlesey	Fenland
0-15	2867	16407	2808	16780
16-24	1334	7413	1638	9768
25-44	3934	22500	3769	23447
45-64	3756	21260	4732	25948
65-84	2210	14098	2711	16793
85 and over	283	1841	400	2526
All	14384	83519	16058	95262
Percentage Growth			12%	14%

Source: Census 2001/2011, AECOM Calculations

**Table 30: Country of birth and length of residence, 2011**

Place of birth	Population	Whittlesey	Fenland	England
----------------	------------	------------	---------	---------

breakdown				
Born in the UK	Total	95.8%	91.4%	86.2%
Born outside the UK	Total	4.2%	8.6%	13.8%
	EU	2.1%	6.2%	3.7%
	Other	2.1%	2.4%	9.4%

Source: Census 2001/2011, AECOM Calculations

**Table 31: Length of residence of those born outside of the United Kingdom**

Length of residence in the UK	Whittlesey	Fenland
Less than 2 years	5%	19%
2-5 years	14%	25%
5-10 years	16%	25%
10 years or more	66%	31%

Source: Census 2001/2011, AECOM Calculations

### 3.12 Overcrowding and concealed families

215. Another indicator of demand in the housing market is shown by the prevalence of overcrowding in the NPA. This is because demand for housing in the area can manifest itself in the over-occupation of housing stock. .

216. One of the most reliable indicators of overcrowding is the 'persons per room' data collected at the household level during the Census. The relative proportion of households occupying different amounts of space in the NPA and the district is shown in the table below, which demonstrates that Whittlesey has seen a significant increase of 25% in the number of households experiencing overcrowding, although this is set against a much more significant rise of 126% in the district as a whole.

**Table 32: Trends in number of persons per room in Whittlesey, 2001-2011**

Persons per room	Whittlesey	Fenland	England
Up to 0.5 persons per room	24.8%	18.3%	7.9%
Over 0.5 and up to 1.0 persons per room	-4.1%	5.2%	7.0%
Over 1.0 and up to 1.5 persons per room	-24.4%	47.4%	27.3%
Over 1.5 persons per room	25.0%	126.3%	2.5%

Source: Census 2001/2011, AECOM Calculations

217. A second indicator of overcrowding is the prevalence of concealed families within the NPA. A concealed family is one living in a multi-family household in addition to the primary family, such as a young couple living with parents.<sup>62</sup> ONS data shows that there are 50 concealed families in Whittlesey, or 1.0% of all families, slightly lower than the average for Fenland, 1.6%, but lower than the average for England as a whole (1.9%). This is not seen as highly significant, although concealed families do indicate that there is unmet additional demand for housing in the area from those already living there, that is, local demand.

**Table 33: Concealed families in Whittlesey, 2011**

Concealed families	Whittlesey	Fenland	England
All families: total	4,973	28,731	14885145
Concealed families: total	50	468	275954
Concealed families as % of total	1.0%	1.6%	1.9%

Source: Census 2011, AECOM Calculations

<sup>62</sup> <http://webarchive.nationalarchives.gov.uk/20160105222245/http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/what-does-the-2011-census-tell-us-about-concealed-families-living-in-multi-family-households-in-england-and-wales-sty-what-does-the-2011-census-tell-us-about-concealed-families.html> (visited 01/09/17)



### 3.13 Rate of development

218. The table below shows the net number of dwellings completed in each of the past five years, as well as the cumulative total. The data shows clearly that the rate of development in Whittlesey has fluctuated significantly between years, that is, it is highly granular. For any given year, it is likely that single development of, for example, 12 homes, may inflate the number of dwellings completed in that year given the relatively small numbers involved.

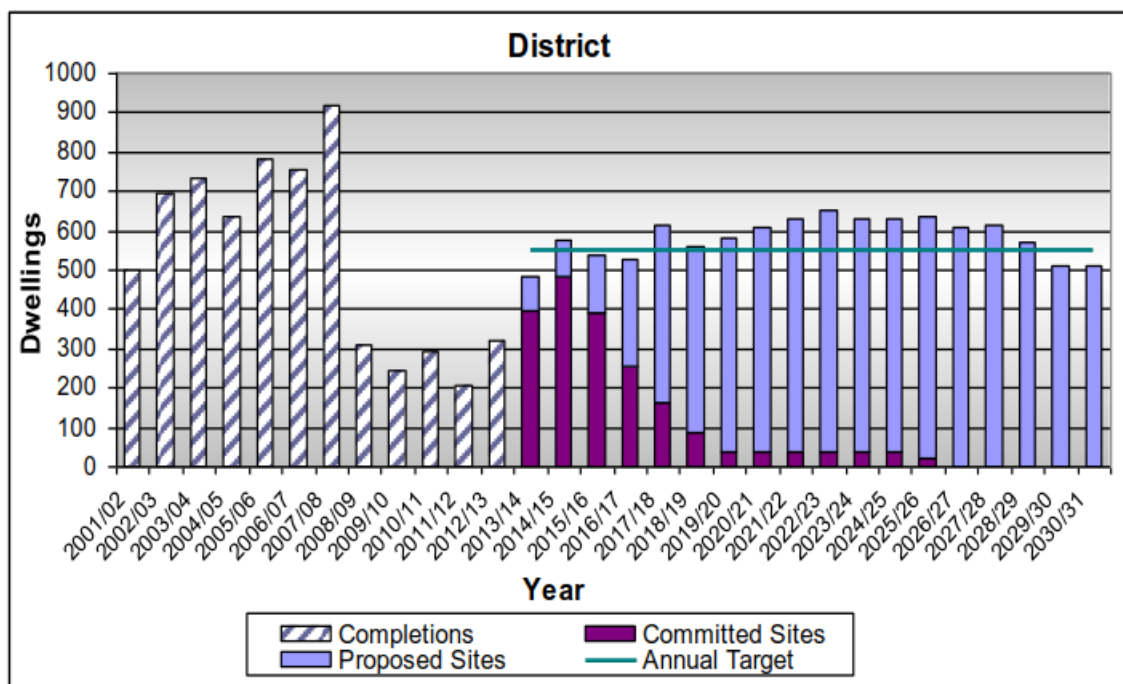
**Table 34: Completions in Whittlesey, 2001-2016**

	2011/12	2012/13	2013/14	2014/15	2015/16
Net completed dwellings	37	12	24	11	15
Cumulative net completed dwellings	37	49	73	84	99

Source: Fenland District Council

219. The fluctuations in the rate of development seen above are indicative of a relatively weak housing market which is unable to deliver steadily over a longer period. This is supported by Figure 22 below, which shows that housing completions in Fenland District have not recovered to their pre-recession levels.

**Figure 22: Past net housing completions and future planned housing and targets, Fenland**



Source: Local Authority Annual Monitoring Reports, AFLP14

220. Planning Practice Guidance suggests that “If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan”.<sup>63</sup> The figure above clearly demonstrates the significant under delivery against planned targets in Fenland from 2008-2015, and in combination with the fluctuations in delivery shown in the table above, this market signal indicates the need for additional planned supply.

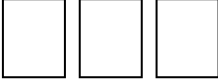





<sup>63</sup> PPG 019 Reference ID: 2a-019-20140306



## Conclusions

### 3.14 Overview

**Table 35: Summary of factors specific to Whittlesey with a potential impact on neighbourhood plan housing**

Factor	Source(s) (detailed in Chapter 5)	Possible impact on future housing need	Rationale for judgement
<b>Employment trends</b>	LEPSEP14, FLP14, SHMA13, FEDS12, Census 2001/11		The wider economic area has been shown to have numerous internationally competitive and nationally significant industries, with a high potential for growth. Furthermore, the growth of nearby Peterborough and Cambridge has been shown to have a likely impact on Whittlesey in terms of demand for housing, as is potential growth in key mature and emerging clusters within the district. Therefore three up arrows has been deemed appropriate.
<b>Housing transactions (Prices)</b>	PPG, FEDS12, Land Registry Price Paid Data for 2007-2016, SHMA13		The Whittlesey NPA has been shown to have experienced a 10% increase in price paid for properties of all types over a ten year period. The price paid varies per housing typology but has been relatively stable across all types, except for flats, for which prices dropped, although this was not seen as significant. Although price growth in Whittlesey was less than in the district as a whole, this was from a higher base, and therefore, two up arrows has been deemed appropriate.
<b>Housing Transactions (Volume)</b>	Land Registry Price Paid Data for 2007-2016, Census 2001/2011 data, SHMA13		The levels of housing typologies sold in the Whittlesey NPA generally matches the level in the existing stock, except for flats and terraces. It is suggested that an increased demand in both the NPA and the district for terraced housing relative to supply, versus a decreased demand for detached houses, is indicative of a lack of affordable housing options, and thus that two up arrows is appropriate.
<b>Migration</b>	Census data 2001, 2011		Migration is not seen as significant factor in determining housing need given that the just 1/3rd of the 4.2% of Whittlesey residents born outside of the UK arrived in the last 10 years.
<b>Overcrowding and concealment</b>	Census Data 2001, 2011		Although there is some evidence of overcrowding and concealed families in Whittlesey, these are not deemed particularly significant given the levels seen in Fenland district as a whole.
<b>Rate of development</b>	FDC, SHMA		The local authorities in the Greater Cambridge Market Area have significantly under-delivered against HMA targets over the past five years. Furthermore the rate of development in Whittlesey is highly granular, fluctuating significantly year to year. Therefore it is reasonable to suggest that the rate of development indicates the potential for future under delivery, and as such two up arrows are deemed appropriate.

**Table 36: Summary of local factors specific to Whittlesey with a potential impact on neighbourhood plan housing characteristics**

<b>Factor</b>	<b>Source(s) (see Chapter 4)</b>	<b>Possible impact on housing needed</b>	<b>Conclusion</b>
<b>Affordable Housing (AH)</b>	SHMA13, Housing Waiting List data	<p>People's ability to access market housing has worsened significantly in recent years, with the Lower Quartile Affordability Ratio<sup>64</sup> reaching 8.21 in February 2013 in Fenland.</p> <p>A household income of roughly £36,000 would be required to buy homes valued around the median.</p> <p>A household income of £25,000 would be required to access a three-bedroom 'entry-level' property.</p> <p>There are 48 households on the Housing Waiting List with a local connection, or 3% of the average of the housing needs projections set out in this study.</p>	<p>Given that £25,000 is the median income for Fenland (as of 2012), it is reasonable to conclude that roughly 50% of households are able to access affordable market housing for sale (AMH), with the remainder requiring subsidy to access suitable housing.</p> <p>The relationship between house prices and household income suggests forms of discounted market sale housing (such as 'starter homes') would be appropriate in addressing housing need.</p> <p>Given current adopted affordable housing policy that seeks 20% of dwellings to be affordable housing on sites of 5-9 dwellings and 25% of the dwellings on sites of 10 or more dwellings, this will be enough to satisfy demand emanating from those with a local connection with the NPA based on Housing Waiting List data.</p> <p>It should be noted that while Housing Waiting List data suggests a modest demand for AH, this is constrained very significantly by the Waiting List eligibility criteria. Changes to both the definition of AH, and these criteria will make a difference to the apparent demand in future years.</p> <p>There is no requirement for the Whittlesey neighbourhood plan to set its own affordable housing policy for developments of more than five dwellings, as well as ensuring a robust approach is adopted to securing affordable housing on sites.</p>
<b>Demand/ need for smaller dwellings</b>	SHMA13, Housing Transactions data (Land Registry)	<p>One person households will make up the majority of household increases from 2011 to 2031, and the majority of these are likely to be older residents.</p> <p>There is an increased demand for terraced housing relative to supply, versus a decreased demand for detached houses.</p>	<p>There will be an under-supply of smaller dwellings, those sized 2 and 3 rooms, unless their representation within the overall housing stock is increased.</p> <p>Housing transactions data reveals a demand for terraced housing that is stronger than for other house-types, justifying a similar realignment of the housing stock as for smaller dwellings.</p>
<b>Demographic Change</b>	Census, SHMA 13	Based on age structure data, Whittlesey is a place with a strong orientation	An important opportunity exists for the Neighbourhood Plan to develop policy around

<sup>64</sup> An accepted measure of affordability expressed as house-prices as a multiple of household income.

towards family life, as well as a place of retirement. the needs of older residents.

In the future, this profile is likely to continue, although with an increasing shift towards an older demographic as current family households mature into those of older couples and singles as their children set up households of their own, many of whom will do so outside the area.

<b>Family-sized housing</b>	Census, SHMA13	Property is relatively affordable for those on incomes around the median and mean, registering an Affordability Ratio of 5.26 and 4.68 respectively.	Households on mean incomes are benefitting from property values well below the average for the sub-region. For those on modest incomes, this makes Whittlesey and attractive place to set up home, reinforcing its strength and established identity as a family-orientated environment.
		The neighbourhood will remain a place with a strong family presence, reflecting the area's continued appeal as a place to bring up children and its established identity as a family-orientated environment.	Market housing, both affordable (AMH) and more expensive properties will be in demand in future years; for this reason, there should be a mix of dwellings types and sizes to underpin the continued role of the NPA as a good place to bring up children, suggesting dwellings of 5 rooms+.
		The data assembled suggests families with children is a household type that is forecast to grow, albeit modestly, in the future.	

<b>Tenure of housing</b>	Census	Census data shows the majority of dwellings are in owner-occupation.	In terms of tenure, the predominant beneficiary of social housing will be young families and solo/couple pensioner households on median incomes and below. Both these groups are forecast to grow in number over the Plan Period, providing a strong rationale for a sizable component of social housing within the overall quota of AH secured as a result of development.
		There has been a decline in the stock of Affordable Homes (and limited availability of forms of intermediate types of AH in particular).	For those ineligible for AH and unable to access AMH for-sale, PRS dwellings will be attractive, underpinning the growth of this market seen in recent years; for this reason policy should support build-to-let development.
		The town has seen a growth in Private Rented Dwellings; this tenure type provides a way of accessing housing for those unable to afford market housing.	As noted above, roughly 50% of households are able to afford market housing without subsidy, justifying an important continued role for market housing within the tenure mix.

## Recommendations for next steps

221. This neighbourhood plan housing needs advice has aimed to provide WTC with evidence on housing trends from a range of sources. We recommend that the Town Council should, as a next step, discuss the contents and conclusions with FDC with a view to agreeing and formulating draft housing policies, in particular the appropriate approach to identifying the level of need for new housing in the NP area, bearing the following in mind:
- Neighbourhood Planning Basic Condition E, which is the need for the neighbourhood plan to be in general conformity with AFLP14;
  - the views of FDC – in particular in relation to the housing need figure that should be adopted;
  - the views of local residents, as captured in household surveys;
  - the views of other relevant local stakeholders, including housing developers;
  - the numerous supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any capacity work carried out by the FDC, including but not limited to the SHLAA; and
  - the recommendations and findings of this study.
222. Housing and Planning Act, will continue to affect housing policies at a local authority and, by extension, a neighbourhood level.
223. This advice note has been provided in good faith by AECOM consultants on the basis of housing data and national guidance current at the time of writing (alongside other relevant and available information).
224. Bearing this in mind, we recommend that the steering group should monitor carefully strategies and documents with an impact on housing policy produced by the Borough Council or any other relevant body and review the neighbourhood plan accordingly to ensure that general conformity is maintained.
225. At the same time, monitoring ongoing demographic or other trends in the factors summarised in Tables 36 and 37 would be particularly valuable.

