

# New housing policies consultation: analysis of results

## 1.0 Introduction

This summarises the results of the external consultation on the three draft housing policies for Greater Cambridge, for which public consultation took place in February /March 2021

It outlines:

- The consultation methodology
- Views raised on the proposed vision & objectives and overall priorities
- Extent to which respondents agreed with the proposed approach to each of the policies
- General themes and issues arising from the consultation
- How the results have been and will be used to influence the policies and implementation of the policies.
- Profile of respondents.

## 2.0 Methodology

External consultation ran six weeks, from 9<sup>th</sup> February to 23<sup>rd</sup> March 2021

The external consultation draft was shaped by consultation with staff and councillors from both councils.

The public consultation was advertised through:

- A local press release
- The consultation pages of both councils' websites
- Social media - Facebook & Twitter
- Emails to key partners, including registered providers, developers and other local authorities in the sub region
- Email to applicants on the councils' housing registers

Presentations were made to Developers and Registered Providers operating locally, and to members of the Joint Development Control Committee.

Questionnaires were available on-line and in paper copy, and email and telephone contact details were also provided.

Respondents were asked to provide some profile information, but could choose which policy or policies they wanted to respond to.

269 individuals and organisations responded.

The sections below give a summary of how the policies have been changed in response to the consultation.

### **3.0 Build to Rent**

#### **3.1. Question: To what extent do you agree overall with the approach taken in the draft policy around development of Build to Rent schemes?**

**Agree/Disagree/Neither agree nor disagree**

192 responses were received to this question.

Of these, 122 (around 64%) agreed overall with the policy; 13 (7%) disagreed; and 57 (30%) neither agreed nor disagreed.

#### **3.2 Question: If there are particular issues which you agree or disagree with (in relation to the Build to Rent policy), please provide more information; and, more generally, is there anything else you would like to add?**

77 respondents replied to one or both of these questions. There was a range of responses, generally showing positive support for the policy and/ or for particular elements of the policy.

The main areas in which people expressed concerns were around housing affordability, the need for and provision of affordable housing, design, and the sort of housing mix that should be provided.

##### **Housing affordability**

- a) A number of people expressed concerns around housing affordability, including difficulties in being able to afford to live locally because of high market rents, and the importance of housing being available to support both those on low and middle incomes. A number of respondents said that 20% discount to market rent would still be unaffordable. Although one felt that it should be left to the market to determine what rent levels should be charged.

##### **Provision of affordable housing**

- b) The need for Affordable Private Rent, and for affordable housing more generally came over strongly. Some wanted to see more than 20% affordable housing being delivered.

- c) Some felt it was important that 40% or more affordable housing was achieved, and that the affordable housing element of Build to Rent schemes – even if only making up 20% of a scheme – should contribute to the overall 40% requirement, with the shortfall being made up elsewhere on the development. However, others – mainly those from the development industry - were concerned that this would be unviable and could disincentivise Build to Rent development. Concerns were also raised that it would put an unreasonable burden on other developers across larger sites. Other comments included that it would be incompatible with the National Planning Policy Framework; that Build to Rent already helps those who cannot afford to buy on the open market; and that it would be likely to require site specific viability negotiation on every scheme.

### **Design quality**

- d) Design issues was another major theme. Some of these concerned issues for which there are already local policies in place which would apply to Build to Rent schemes as they would to other developments. These included general quality of design, space standards, noise prevention, the importance of a range of environmental sustainability requirements – both within schemes and in the surrounding area - and car and cycle parking concerns. There was also some support for the need for communal, outdoor and workspace, although one respondent questioned why this should be required in Build to Rent schemes and not in other types of development. Other comments were around the types of homes that should be provided (including houses with gardens and bungalows); the need for homes designed so that people could remain there for life; and the importance of taking into account the character and context of the surroundings.

### **Housing mix**

- e) There were differing views on the sort of housing mix which should be provided, varying from the need for a wide mix to support a range of different households and to promote mixed communities, to the view that the market should decide what housing mix is provided, focusing on the groups most likely to be the target market.

### **Other themes**

Other emerging themes included the following:

#### **Market and eligibility.**

- f) There was a range of views on who Build to Rent should be provided for and who should be eligible for all or some of the homes. Groups suggested included: younger people; older people; local workers; rough sleepers; leases

to supported housing providers; and local people who want to remain near family and friends, including where Build to Rent is provided in rural areas.

**Assessing housing needs.**

- g) Comments here varied from assessment of housing needs being the role of the developer, to it being the council's responsibility alone. A couple of respondents pointed specifically to some of their own research which could be used to help identify needs.

**Policy objectives.**

- h) Some commented on the objectives of the policy, including the importance of promoting strong communities. One respondent questioned whether promoting economic growth was a positive thing.

**Role of Build to Rent in building communities.**

- i) It was suggested that Build to Rent may be able to contribute more positively to building communities than the policy suggests, and there was also a challenge to some of the issues which the policy identifies as being potentially negatively associated with building communities through Built to Rent. For example: that bringing forward schemes early can foster a sense of community and help to accelerate infrastructure provision; and events and shared spaces help to bring tenants together; there is minimal risk of schemes not remaining as Build to Rent long into the future, regardless of covenant lengths; schemes provide a high quality, customer-focussed service management service; tenure certainty is a positive thing; it is in investors' interests to keep tenancies running for as long as possible; and sub-letting is low risk as standard tenancy conditions would not allow it.

**Scheme sizes and layout.**

- j) Some emphasised the importance of integrating the market and affordable housing within a scheme. There was also some support for limiting sizes of schemes. However, there was also some concern about the option to limit the size of schemes and to require larger schemes to be spread out rather than located in one area, based on viability concerns, ability to attract investment, and ease of management.

**Tenancy lengths.**

- k) Views on tenancy lengths varied, with views both for and against minimum three-year tenancies and being able to extend them.

**Covenant periods.**

- l) One respondent was concerned that requiring a longer than 15-year covenant period might deter investment.

**Clarity of policy.**

- m) Some of the comments demonstrated that people hadn't quite understood the policy or that the policy needed clarifying, such as the difference between affordable social housing and Affordable Private Rent; and that the affordable housing contribution – whether it be through Affordable Private Rent or any financial contribution made in its place - needed to remain available to the councils long term. One respondent was also unclear why councils might occasionally prefer a financial contribution rather than affordable housing on-site.

**Other policies and plans.**

- n) Views were raised on other issues not covered by the policy but picked up in other council strategies and policies, such as the need for more social housing, including identifying land for and building more council housing; the importance of promoting home ownership and routes to home ownership; the need for early provision of community facilities and infrastructure; and the need for a more coherent approach to housing rather than having a single-issue policy on Build to Rent.

**National policy concerns.**

- o) Some of the comments received were around national policy; either emphasising the need to follow it or disagreeing with it. Some respondents disagreed with elements of the policy which are in fact based on national Build to Rent guidance and therefore less within the councils' control. Examples included: the view that more than a 20% rental discount should be set as a minimum; that 20% affordable housing was not a high enough starting point; that Affordable Private Rents should be set relative to earnings rather than market rents; what minimum tenancy lengths should be used; and disagreeing with national private rental policies. There was also a split in opinion over whether or not Build to Rent itself was a good thing.

**Enforcing the policy.**

- p) Questions around the extent to which the policy would be enforceable, both in relation to bringing schemes forward and in ongoing management. Some respondents were concerned that developers may not be required to follow it and that they may try to avoid complying on viability grounds. One comment from the developer side challenged whether the policy would have sufficient weight as a material consideration in making decisions on planning applications.

**Viability.**

- q) Concerns around the viability of achieving some or all elements of the policy, and the impact that too many requirements could have on securing investment into the sector. As well as issues raised above, other examples included: the need for flexibility in design and layout; requiring schemes to be

spread out across larger sites; the council having the option of limiting the size of schemes was a particular concern here.

**Equalities and social values.**

- r) A concern that equalities and social values had not been addressed within the policy.

**Home-Link applications.**

- s) Unrelated to the policy, a number of applicants had concerns or questions about their Home-Link housing applications. .

**Decision-making**

- t) One respondent highlighted the importance of involving women in decision-making to ensure developments are practical for women.

**3.3 How consultation responses have been used to influence the Build to Rent policy**

General support for the policy and what the councils are trying to achieve from it, and the general flexibility already built into a number of elements of the policy, suggest that no major changes need to be made to the proposals. The following shows what has been done to reflect the themes which emerged from the consultation.

**Housing affordability**

- a) The policy already recognises affordability challenges locally, the need for Build to Rent to include an element of affordable housing, that 20% discount to market rent is likely to be unaffordable to many, and the need to ensure homes – particularly Affordable Private Rent - are as affordable as possible to people on a range of incomes. Setting Affordable Private Rents at a minimum 20% discount is national planning policy so has not been changed, but it has been emphasised that 20% is the minimum and the councils will seek a higher discount wherever possible.
- b) Added explicit recognition that that may be challenges to achieving 40% affordable housing across major multi-tenure developments, such as viability issues where they can be clearly demonstrated, and ensuring that rents remain at reasonable levels.
- c) The requirement for a minimum of 20% affordable housing has not been changed as it aligns with national requirements and there is flexibility within the policy to increase the percentage where appropriate. However, emphasis has been added that this is a minimum requirement and that the councils will seek a higher level of affordable housing wherever possible. National Planning Policy on Build to Rent allows for a higher percentage of affordable

housing to required through a council's Local Plan if justified by housing needs assessment evidence. A needs assessment is currently under way to inform the new Local Plan, which will include the housing needs of people who rent their homes; this will help to inform what should be included on Build to Rent and affordable housing provision in the new Local Plan.

### **Design quality, and other policies and plans**

- d) Made stronger reference to the need to meet requirements in other council policies, including the Local Plans, Sustainable Design and Construction Supplementary Planning Document and the wider Greater Cambridge Housing Strategy. Also the need to comply with other local planning policies, including site-specific Supplementary Planning Documents and Area Action Plans. Examples have been added of where these would be relevant, including requirements around: environmental sustainability; housing densities; design quality; the need for a balanced mix of housing sizes, types and tenures; recognising the wider area context; car & cycle parking; and bringing forward local amenities.
- e) The policy does not stand alone; it will form an annexe to the Greater Cambridge Housing Strategy which covers a broader range of housing issues.

### **Housing mix**

- f) No change was made around housing mix, as research evidence suggests that some larger properties may be required, and decisions need to be made based on up to date evidence. Having a mix of sizes reflects what is already in the councils' Local Plans and is important in bringing forward mixed communities.

### **Market and eligibility**

- g) Added more about the likely market for Build to Rent, including younger people but also some potential demand from other age groups and families.
- h) Strengthened the section on eligibility for Affordable Private Rent. This includes referring to national requirements around the role of local authorities in setting eligibility criteria, and that the councils may want to ask for housing register applicants or those with specific needs to be considered in eligibility criteria where appropriate
- i) Other than that there is already flexibility in the policy for Build to Rent to meet a range of needs.

### **Assessing housing needs**

- j) No changes have been made around assessing housing needs as the policy already refers to taking account of relevant research.

### **Policy objectives**

- k) As there was little objection to the objectives of the policy, no changes have been made here other than wording around the role of Build to Rent in supporting the economy rather than supporting economic growth.

### **Role of build to rent in building communities**

- l) Added to the list of potential benefits of Build to Rent, including: greater tenure certainty; enabling people to live in the area who wouldn't be able to afford to buy or for whom renting is the preferred option; opportunities to accelerate occupation on larger sites, subject to appropriate community infrastructure being in place; and opportunities to develop communities within Build to Rent schemes where appropriate infrastructure and amenities are provided alongside a good customer-focused service.
- m) Changed the wording around some of the risks of schemes, including recognising that it is in investors' interests to manage schemes effectively and any problems that arise are more likely to be further down the line, and including the role of enforcing tenancy conditions in preventing sub-letting.
- n) Added an expectation that the management company would work alongside other local community development provision as appropriate.

### **Scheme sizes and layout**

- o) Added that the requirement to avoid large mono-tenure clusters of Build to Rent homes conforms with the councils' Local Plan and Housing Strategy requirements around providing a balanced mix of housing sizes, types and tenures. The policy already refers to the need to clearly demonstrate where conforming with the policy is not viable. The importance of integrating market and affordable homes is also already emphasised in the policy.

### **Tenancy lengths**

- p) No change has been made around tenancy lengths as what is proposed is in line with national policy guidance on Build to Rent.

### **Covenant periods**

- q) No change has been made to the minimum 15- year covenant periods as research shows that covenant periods may be longer, but have added that covenant periods of longer than 15-years will be sought wherever possible.

### **Clarity of policy**

- r) To emphasise the differences between Build to Rent & Affordable Private Rent and other forms of affordable housing, we have added that Build to Rent including Affordable Private Rent are types of private rented sector housing which tend to be funded by commercial investors seeking a long-term income.



- s) Added achieving a better overall tenure mix as an example of where a financial contribution might be a better option for the councils than Affordable Private Rent provided on site.
- t) Clarified that any financial contribution in place of providing Affordable Private Rent on site must be equivalent to the cost of providing Affordable Private Rent, and that the money would be used for investment in affordable housing elsewhere in the Greater Cambridge area. It must also be available long-term.
- u) Added that rent setting and review requirements relate to both market and affordable homes.
- v) Added response to demand as an example of where switching tenures of individual properties might be appropriate.

#### **National policy concerns**

- w) No changes have been made here as the councils are expected to follow national policy and guidance. The policy already states that Build to Rent is a tenure recognised by the National Planning Policy Framework, so the policy is around how, rather than whether, Build to Rent should be brought forward locally.

#### **Enforcing the policy**

- x) A link to government guidance has been added on what constitutes a material consideration in dealing with planning applications.

#### **Viability**

- y) The policy recognises that viability will need to be taken into account in complying with the policy, and any viability challenges clearly demonstrated . However, we have added that the councils recognise there may be particular challenges around achieving 40% affordable housing across major multi-tenure development sites, but that reasons for any deviations would need to be clearly justified.

#### **Equality and social value**

- z) Added the need for equalities monitoring as part of the monitoring of the Affordable Private Rent housing, and a section on how the policy aims to promote equalities, including a link to the Equality Impact Assessment. We considered that social value had already been picked up to some extent through affordability and affordability requirements and through emphasising the importance of successful communities.

### **Home-Link applications**

- aa) No changes have been made here as the comments were not relevant to the policy itself. As no personal data was collected we were not able to respond directly to these.

## **4.0 Clustering and distribution of affordable housing**

### **4.1. Question: To what extent do you agree overall with the approach taken in the draft policy around the clustering and distribution of affordable housing? Agree/Disagree/Neither agree nor disagree**

174 Responses were received to this question.

Of these, (112) 64% agreed overall with the policy; (13) 7% disagreed; and (49) 28% neither agreed nor disagreed.

### **4.2 Questions: If there are particular issues which you agree or disagree with (in relation to the clustering policy), please provide more information; and, more generally, Is there anything else you would like to add?**

Of those that responded above, 47 made further comments. There were five key themes arising from the comments. These were cluster sizes, clustering in flats, mixing tenures, mixing unit sizes, local lettings plans.

Below is a summary of the comments:

#### **Cluster Sizes**

- a) Eight of the respondents commented specifically on cluster sizes. In principal they agreed that the affordable units should be clustered around the site. Six respondents thought the cluster sizes were right for the size of a small, medium & large scheme. Two respondents thought the cluster sizes should be smaller or individual units pepper-potted around the site. One respondent said they didn't support the criteria that clusters should not abut, saying the information wasn't always available.
- b) Two respondents questioned why the affordable units should be clustered at all. Of those one remarked that the 'worst tenants drag the others down'.
- c) Two respondents said although they agree with the cluster sizes, it was important that any negative behaviour should be dealt with robustly & swiftly to ensure it does not impact on the rest of the homes in the vicinity.
- d) One respondent commented that parts of the policy had been based on previous supplementary planning policies and where was the evidence that these parts of the policies had worked.

- e) One respondent recommended that the removal of clustering restrictions is considered, where additional affordable housing over and beyond the S106 requirement is provided.
- f) Two respondents said that with two large scale regeneration sites on the horizon (Cambridge East & Cambridge North) the policies will need to be flexible enough to respond to site specific design and delivery parameters.

### **Clustering in flats**

- g) Two respondents commented that twelve flats to a block for a development of thirty units was too many. It would encourage developers to build flats in village settings, which proved to be unpopular and unhealthy during the pandemic. It would also encourage the flats to be all in one location.
- h) One respondent said that the approach of twelve flats to a block is inflexible. There is no clear reason for this number. It will increase the inefficiency of buildings by adding more communal space to a development, increasing costs and land take.
- i) Seven respondents agreed that prioritising the elderly, disabled or tenants with mobility issues and families for ground floor flats was important. One respondent said that families need houses, not flats.
- j) One respondent said that having their own front door from the street is important when space can be afforded. Where multi storey developments are necessary then careful attention should be given to access stairwells and corridors, which must be spacious, safe and offer privacy.
- k) One respondent said that seeking ground floor flats with no access via common internal areas will increase costs and the approach appears to have no justification.

### **Mixing tenures in general**

- l) One respondent said the tenures should all look the same. You should not be able to see the difference between owner occupier and affordable housing.
- m) One respondent commented that it may not always be possible to provide for a mix of affordable tenures including rented and intermediate housing, on all sites that qualify for affordable housing. Recognition of this should be made in the policy wording.
- n) One respondent said they had experience of living in a shared ownership flat where there were also social housing tenants. Some of the tenants did not respect the communal areas or gardens, this cause issues between the

residents. A further respondent said they did not support mixing tenures in flats unless they have their own 'core'. However, they have no issue with mixing tenures across clusters.

- o) One respondent said that social housing should not be mixed in with owner occupier housing. They live on a new development and they have suffered ongoing issues with anti-social behaviour, drug dealers, knife crime and sex offenders living close by.

#### **Mixing unit sizes**

- p) Four respondents are in favour of mixing unit sizes in clusters to provide a diverse and integrated place to live.
- q) Two respondents are concerned about flats that are let to families being in blocks with single people or couples. They say it is likely that families will need to live above the ground floor and noise may become an issue.
- r) One respondent considers the draft policy to be too descriptive. They say it may be more viable for housing providers to place more than four larger units together. Different sites may not be suitable for a variety of unit sizes and different providers may be focussed on providing small 2-3 bed dwellings rather than larger 4-5 bed properties.

#### **Local lettings plan**

- s) Two respondents welcome the use of local lettings plans to ensure a mixed and balanced community.
- t) Four respondents say that people with local social and working connections should have priority. This will provide a sense of community and sustainable travel habits.

### **4.3 How consultation responses have been used to influence the Clustering policy**

#### **Clustering**

- a) No change proposed to numbers in policy. All concerns regarding changes to policy for additional affordable units over and beyond the S106 requirements and large scale regeneration sites are covered in 'Exception to policy' section of the new policy. The concerns relating to anti social behaviour will be addressed with the use of local lettings and robust housing management plans.

- b) No change proposed to policy requirement of ‘no affordable housing clusters to abut each other’. If information is not available because a planning application on a neighbouring parcel/scheme has not been submitted, then the application submitted first takes precedent.

### **Clustering in flats**

- c) No change is proposed to number of flats to a common stairwell/lift. This number has been in policy for several years and registered providers say this is a reasonable number for ease of housing management. The original number was based on the Homes & Communities Agencies Design Guide, which said that a maximum of 15 units should share a stairwell/lift.
- d) No change to request for ground floor flats to have their own entrances. This is not policy and is a request for developers to consider when planning a new scheme.

### **Mixing tenues in general**

- e) The request for one tenure per floor has been removed from the policy. Developers are requested to take care with placement of flats generally.
- f) With regard to the comment that it may not be possible to provide for a mix of affordable tenures. The tenure split for Cambridge City Council and South Cambridgeshire District Council is already policy and is part of each councils Local Plans. Any divergence from this would require a viability assessment and the relevant council’s agreement.

### **Mixing unit sizes**

- g) No change to policy regarding mixing of unit sizes. Care should be taken in flats with regard to family units.
- h) No change to policy regarding the request to refrain from placing more than 3 and 4 larger units together. Registered providers prefer to mix the units to ensure that there are no area’s of high child density. With regard to the type of units to be provided on site, the affordable housing mix is determined by the local housing need and ongoing dialogue with planners and the housing strategy team.

### **Local Lettings Plan**

- i) Respondents welcomed the use of local lettings plans to create sustainable and diverse communities to live in. Overall the respondents like the idea that some allocations may be prioritised for local people with social or working connections.

## 5.0 Setting of Affordable Rents

### 5.1 Question: To what extent do you agree overall with the approach taken in the draft policy around the setting of Affordable Rents?

**Agree/Disagree/Neither agree nor disagree**

167 responses were received to this question.

Of these, (112) 67% agreed overall with the policy; (13) 8% disagreed; and (42) 25% neither agreed nor disagreed.

### 5.2 Questions: If there are particular issues which you agree or disagree with (in relation to the Affordable Rents), please provide more information; and, more generally, Is there anything else you would like to add?

From those that responded to this question, 35 respondents made further comments. There were five key themes arising from the comments around affordability, the need for different tenures, zero carbon and design of homes, viability and enforcement of the policy.

Below is a summary of the comments:

#### **Affordability**

- a) Eight of the respondents commented on the issue of affordability for Greater Cambridge and generally felt that 80% of a market rent was not affordable in the area. In principle, they agreed with the proposed policy to seek a lower threshold for Affordable Rents in Cambridge set at 60% of a market rent and 70% for South Cambridgeshire.
- b) Seven of the respondents felt that the proposed rent levels within the policy were still unaffordable and set too high. It was suggested that Affordable Rents should be based on the affordability measure that a household should pay no more than 35% of their income on rent.
- c) Four of the respondents felt that Affordable Rents should not be calculated based on a discounted percentage of market rent, with some suggesting it should be calculated based on household incomes. It was also suggested that those on very low incomes should get a top-up.
- d) Two respondents commented on the cost of current Affordable Rents being charged, with one respondent stating this policy would not change existing Affordable Rents which were in some cases higher than the cost of a mortgage.

### **Different Tenures**

- e) Three of the respondents felt that a lower rent would enable households to save towards a mortgage and felt that schemes to help households into home ownership should be encouraged.
- f) One respondent felt it was not fair to focus on Affordable Rent but that there should be schemes to help those that would not necessarily be successful in securing an Affordable Rented home.
- g) One respondent suggested that there were some strong principles in the policy which could be relevant to rent setting, such as for the Affordable Private Rent component of a Build to Rent scheme. It was also suggested that the Councils should consider establishing other forms of affordable tenure that could form part of a mix of affordable housing on all schemes, drawing on the principles set out in the draft Policy but with a focus on key workers, including NHS workers at Cambridge University Hospitals. Reference was made to the Mayor of London's Living Rent whereby the concept should be considered for a Greater Cambridge Living Rent.

### **Zero Carbon and Design of Homes**

- h) Five respondents made reference to zero carbon and the design of new homes. This follows the reference in the draft Policy to allow Affordable Rents to be charged at up to 80% of a median rent if homes are built above the national or local standards and can demonstrate that higher rental costs will be offset by lower utility bills.
- i) Three of the respondents said it was essential that all new developments should be designed as zero carbon.
- j) One respondent queried whether the running costs of a more energy efficient property would be low enough to offset a rent up to 20% higher in Cambridge or 10% higher in South Cambridgeshire. A further respondent said it will be crucial to ensure that it would genuinely be cost neutral for tenants.

### **Viability**

- k) Three respondents were concerned that this would be counter-productive and make schemes unviable.
- l) In particular two respondents felt that the discount was too high, with two respondents stating it should be in line with Homes England guidance of 80% of a market rent and not capped at LHA.
- m) One respondent supported the general principle but was concerned that capping Affordable Rent below levels permitted by national policy would limit the flexibility for site-specific proposals. Such a policy change may have unintended consequences and prevent what may have otherwise been an optimum solution for a scheme.

- n) Concern was raised by one respondent that the policy had not had any viability testing and therefore it was unclear as to what extent it risks reducing the delivery of affordable homes.
- o) One respondent felt that the approach of setting rents linked as a proportion of those 'in the village/local adjoining area' is not in line with MHCLG Policy on the Statement on Rents for Social Housing which requires a RICS valuation, having regard to the specific location and character of the home (rather than the general adjoining area). The respondent suggests that the policy should be amended to retain flexibility for Affordable Rents to be set at up to 80% of market rent (assessed in line with RICS guidance) or LHA whichever is the lower. Supporting text can encourage developers to explore lower rents, based on local need and balancing objectives to maximise the number of affordable homes delivered.
- p) In terms of affordability, one respondent commented that keeping rents so far below the Local Housing Allowance would mean that the Councils will, in the case of tenants in receipt of LHA, be transferring funds from national government via Universal Credit. It was suggested that raising Affordable Rents closer to LHA levels would generate significant additional income which could be used to target anti-poverty work or improve fuel efficiency of homes.

#### **Enforcement of the Affordable Rents Policy**

- q) Four respondents raised concern as to how the Affordable Rents Policy would be enforced.
- r) Generally the comments were supportive of the Policy, but one respondent raised concern that unless all Registered Providers (both for and non-profit) work in partnership with the Authority to deliver this proposal it would not work. It would put those Registered Providers who follow the Policy at a disadvantage when looking to secure new opportunities to deliver affordable housing. Developers and contractors should be made aware of the Affordable Rent policy.
- s) One respondent questioned the wording of the Policy and whether the Policy had any binding requirement on housing providers to set Affordable Rents as determined by the Council.
- t) One respondent felt that the Local Authority should be taking the lead and not put the responsibility onto private developers to take on an obligation which they are likely to seek to relax.

#### **5.3 How consultation responses have been used to influence the Affordable Rents policy**



### **Affordability**

- a) No change is proposed. There were some suggestions that the rents should be set at a lower discount, but the policy aims to ensure Affordable Rents are kept at previous LHA levels prior to the significant increase in LHA in March 2020. It does not look to seek lower rents than previously achieved, and is caveated with the need to prioritise social rents wherever possible which are lower than an Affordable Rent. This is in line with the MHCLG Policy Statement for Rents for Social Housing which states that Affordable Rents are typically higher than social rents.
- b) There was some suggestion around setting rents in line with individual household incomes. This would be outside of the remit of the definition of Affordable Rents which is up to 80% of a market rent.

### **Different Tenures**

- c) No change is proposed. Comments relating to the availability of different tenures to help people into home ownership are not relevant to this specific policy but is a wider consideration as set out in the Greater Cambridge Housing Strategy and Local Plans.
- d) The comment relating to a different rental product similar to the mayor of London's Living Rent, would not come under the definition of an Affordable Rent and therefore not specific to this policy. However, this has been considered in the wider context but it was felt that a 'Living Rent' type model is less affordable than the principles set out in this policy. In terms of targeting homes for specific groups, such as key workers, Local Letting Plans are probably the best way to target specific groups of people on individual developments, according to need.

### **Zero Carbon and Design**

- e) No change is proposed. In terms of where higher rents at 80% of a market rent are set which will offset lower utility costs, this will need to be evidenced on an individual basis.

### **Viability**

- f) No change to discounts proposed. Whilst some argued that this policy would affect viability and had not been properly tested, it should be noted that this policy is not looking for lower rents than what was previously being provided pre-covid based on 2019 LHA rates. Schemes were proving viable based on the lower LHA rates which are in line with this proposed policy.
- g) Clarity has been added to the Policy in terms of rebasing Affordable Rents, in accordance with the MHCLG Policy Statement on rents for social housing.
- h) There was a comment that the approach to setting rents linked as a proportion of those '*in the village/local adjoining area*' is not in line with the

MHCLG Policy Statement on rents for social housing. The wording within the Councils' Policy on Affordable Rent Setting has been amended to reflect the wording within the MHCLG Policy in terms of '*within the location*' rather than '*village/local adjoining area*'.

### **Enforcement**

- i) No change is proposed. Whilst there was some concern that the policy did not go far enough in terms of enforcement, paragraph xx is clear that the Council does not have any real powers to control rent-setting and the wording within the policy is one of working in partnership as to the Councils' preferred approach. This has generally been successful previously as a consensus with Registered Housing Providers.
- k) Whilst the Council cannot enforce this policy, there will be reference to it within the S.106 Agreements so that both developers and Registered Housing Providers understand the expectations of the local authority. This will be monitored as part of the planning process and the approval of the Registered Housing Provider.

## **6.0 Profile of Respondents**

Please note that the identification of respondents is set out as the information supplied and may not reconcile with each question asked. Percentages have been rounded up.

### **Individuals or organisations?**

Of the 263 respondents:

- 217 (82%) responded as an individual (a resident or a small private landlord)
- 31 (12%) responded on behalf of an organisation or business
- 15 (6%) responded as Other.

### **Status of Respondents**

Of those that responded:

- 85 (32%) - an individual living and working in Cambridge or South Cambridgeshire
- 81 (31%) - applicants on Cambridge City or South Cambridgeshire District Council's housing register

Greater Cambridge Housing Strategy – new housing policies 2021  
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70 (27%) - individuals living in Cambridge or South Cambridgeshire (not in social housing or on the housing register)

58 (22%) - a tenant or leaseholder living in social housing

49 (19%) - an individual working in Cambridge or South Cambridgeshire

12 (5%) - private housing developer

11 (4%) - a registered housing provider

10 (4%) - an individual operating as a small private landlord in Cambridge and/or South Cambridgeshire

9 (3%) - other

7 (3%) - a private housing investor

7 (3%) - an individual living outside, but close to, the Greater Cambridge area

6 (2%) - from an organisation or business operating/planning to operate in Cambridge and/or South Cambridgeshire

5 (2%) - a parish council in South Cambridgeshire

2 (1%) - a Residents' Association

## **Tenure of Respondents**

Of those that responded:

65 (25%) - private tenants

64 (24%) - owner occupiers

36 (14%) - council tenants

33 (13%) - housing association tenants

27 (10%) - other

24 (9%) - organisations/business

8 (3%) - private landlords

3 (1%) - council leaseholders

3 (1%) - shared owners (part own and part rent their home)

### **Age of individuals**

Of those that responded:

21 (12%) - preferred not to say

7 (4%) - aged between 18-24

29 (17%) - aged 25-34

35 (21%) - aged 35-44

25 (15%) - aged 45-54

27 (16%) - aged 55-64

24 (14%) - aged 65+

### **Ethnicity of individuals**

Of those that responded:

93 (56%) - White British

26 (16%) - White Other

20 (12%) - preferred not to say

11 (7%) Asian/Asian British

8 (5%) Black/African/Caribbean/Black British

4 (2%) Mixed/multiple ethnic group

3 (2%) - Other

2 (1%) - White Irish

### **Disability of individuals**

Of those that responded:

126 (75%) - no disability

18 (11%) - yes had a disability

24 (13%) - preferred not to say

**How people heard about the survey**

Of those that responded:

129 (77%) - email

17 (10%) - facebook

7 (4%) - word of mouth

5 (3%) - other

4 (2%) - website

3 (2%) - council magazine

2 (1%) - twitter

1 (1%) - local newspaper