

Housing Enabling Comments- Kidnappers Lane 21/00847/REM, 12.01.22

Housing Enabling Comments Summary: Kidnappers Lane, 21/00847/REM, 12.01.22:

This officer previously raised two objections to the scheme; first, that the sustainability proposals for the affordable homes were inferior to those provided to the market homes. Secondly, in regards to the significant disparity between the external visual appearance of the affordable homes and their market counterparts.

Addressing the first concern, the applicant has submitted a statement (dated 07.01.22) confirming their commitment to deliver zero-carbon affordable homes (as well as clarifying how this will be achieved through design and construction). As such, the policy expectations of JCS Policy SD12: Affordable Housing have been met. Additionally, it is recognised that this commitment exceeds the policy requirements of JCS Policy SD3: Sustainable Design and Construction.

Assessing the second point, whilst the applicant's updated statement provides a logical explanation as to why the affordable homes cannot be "equal to that of market housing in terms of appearance" as per JCS Policy SD12, it is somewhat regrettable that this policy requirement cannot be fulfilled.

However, on balance, given the considerable prior engagement between the applicant and Council and the pressing need to determine this planning permission, it would be unreasonable to pursue any further design changes to affordable homes in this instance. Moreover, the applicant's firm commitment to delivering zero-carbon affordable homes (which is of significant benefit) means that, upon reflection, the applicants proposals in regards to the external visual appearance of the affordable and market homes are considered to be satisfactory.

Sustainability & Build Materials:

Within previously submitted Housing Enabling Comments dated 07.01.22, concerns were raised regarding the applicant's approach towards delivering low-carbon affordable homes on the Kidnappers Lane scheme, which compared unfavourably to the market provision, which would meet zero carbon standards, as confirmed within the applicant's Revised Design and Access Statement (dated 07.09.21).

In policy terms, this approach fell short of our adopted policy position found within JCS Policy SD12: Affordable Housing, in regards to ensuring that- "the design of affordable housing should... be equal to that of market housing in terms of appearance, build quality and materials". The intention of this policy, is, in effect, to ensure that the affordable homes are built to an equivalent standard of their market counterparts.

Having received the applicant's response to this concern, this officer is pleased to report that the revised approach is now consistent with JCS Policy SD12: Affordable Housing, and clearly explains how reductions in carbon emissions (and, by extension, reduction in fuel bills and effective approach towards tackling fuel poverty) will be effectively addressed through the build and design of the affordable homes. The applicant's clear written commitment to delivering zero carbon affordable homes is commended by this officer and will hopefully set an example for other developers to follow on future schemes.

As mentioned in the applicant's response, this Officer both recognises and welcomes the delivery of net-zero carbon affordable homes that exceed the expectations of our adopted policy (in this case, JCS Policy SD3: Sustainable Design and Construction). This point is especially relevant in light of the exponential rise in the cost of gas and electricity, which, when coupled with rising inflation rates and national insurance tax, is likely to have a serious and disproportionate impact upon low income households.

In summary, therefore, the improvements made to the design and build of the affordable homes to meet zero carbon emissions represents, (in this officer's view) a significant benefit to the scheme and is consistent with the policy expectations enshrined within JCS Policy SD12: Affordable Housing.

External Visual Appearance

Above and beyond concerns raised regarding the proposed carbon reduction measures offered to affordable homes, this officer's previous Housing Enabling comments (dated 07.01.22) also objected to the proposed scheme on the grounds of significant visual disparity between the market and affordable homes. In terms of the Council's adopted policy position, the previously submitted Housing Enabling comments raised concerns that the proposed scheme was falling short of JCS Policy SD12: Affordable Housing, which states that: "the design of affordable housing should...be equal to that of market housing in terms of appearance". This point was also echoed within the Section 106 agreement relating to this scheme which states that: "To ensure integration of the affordable housing units with the open market units to the extent that the affordable housing units shall be generally indistinguishable in appearance from the open market units in terms of unit design".

The applicant's response to these concerns (dated 07.01.22) contends that it would not be appropriate (or in keeping with the aesthetic of the local area) to make changes to the currently proposed visual appearance of the affordable (or market) homes.

Having considered the applicant's response to these concerns, this officer is satisfied, given the detailed explanation provided by the applicant, that, with the exception of the "cladding provided on larger properties to provide visual relief" that the market and affordable homes do not significantly differentiate between each other.

To justify the inclusion of the grey cladding provided on the larger market homes (which are not included on the affordable provision), the applicant suggests that: "a closed cell product made from recycled materials has been used to clad the larger properties... which is relatively new to the market and has therefore not achieved the certification required to use this on a party wall (a party wall being a dividing wall between two adjoining buildings, as is present on the affordable homes)", as such, the applicant suggests that it would not be practicable or feasible to ensure that this particular detail was included on both market and affordable homes.

In this Officers view, this disparity between the affordable homes and their market counterparts is less than ideal. However, on balance, it is appreciated that the scheme had already been through significant consultation between the Council and the applicant, and is due to be determined within weeks. Accordingly, it would be unreasonable for the Council to require the applicant to make major design changes to the proposed scheme. Additionally, it is recognised that the applicant has recently made significant amendments to the proposed scheme to accommodate the provision of zero-carbon affordable homes, which is clearly of significant benefit. In this vein, the applicants proposals in regards to the external visual appearance are considered to be satisfactory.

Additional Comments:

It is acknowledged that the applicants offer to increase the size of the 3 bedroom 5 person Shared Ownership and Affordable Rented homes respectively to meet the specifications of two 3 bedroom 6 person houses (following a request from this officer) exceeds the expectations set out within the Section 106 agreement, thereby representing a further positive element of the proposed affordable housing scheme.

Ewan Wright

Housing Strategy & Enabling Officer

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