

Matter 8: Strategic Policies for Housing

Policy HN01 Housing Need: Affordable Homes

Question 1 — Meeting affordable housing need

- 1.1.1. The 40% requirement is a justified starting point, but full delivery of identified need is not demonstrated. HDC identifies 421 affordable homes needed annually and acknowledges that this is notionally 67% of its minimum housing requirement: [Housing Mix and Type Topic Paper, TPC-NLP8, paragraph 2.3.5, p.5](#). Its reported 2020–25 delivery is 850 affordable homes among 4,214 completions, approximately 20%: [paragraphs 2.3.11–13, p.6](#). That is not proof of individual policy breaches: HDC identifies bungalow-counting and provider/market difficulties. It is evidence that the headline percentage cannot substitute for an affordable-housing delivery forecast. The Plan would meet need in part; a quantified, tenure-specific trajectory, including justified exceptions and additional provider-led supply, is needed to substantiate how much. SA02's full policy yield should not be assumed merely because 40% appears in HN01. [Reg19 §8.1.5, p.34](#).

Question 2 — Exceptional circumstances

- 1.1.2. Not. Criterion a) concerns where provision occurs; d) concerns reducing its amount. [HN01 and paragraph 6.10, pp.98–100](#) do not adequately distinguish those decisions: the explanation describes exceptions to on-site provision solely through viability. [NPPF paragraph 64, p.18](#) also requires an off-site arrangement to contribute to mixed and balanced communities. Each departure should therefore identify its justification, the retained quantity and tenure, and how equivalent provision will actually be delivered. An off-site exception must not silently become a reduction in affordable housing. [Reg19 §8.1.5, p.34](#).

Question 3 — Viability alongside other requirements

- 1.1.3. The evidence supports seeking 40%, but does not yet establish reliable simultaneous delivery of that proportion and all obligations (e.g. at SA02, for which the whole-site, 4,000-home appraisal shows residual land value of £50.145m against a £63.540m benchmark at 40%: a

£13.395m benchmark shortfall ([INF-NLP3, Table 7.2, p.86/PDF p.91](#)). Its consultants nevertheless recommend 40%, citing potential placemaking benefit and uncertain land values. [OWBC's March 2026 assessment, paragraphs 11.7–11.9, p.86/PDF p.91](#), retains the earlier whole-site test rather than separately retesting AP4. [HDC12, PDF pp.4–5](#) reports lower district-wide infrastructure costs, but does not demonstrate the resulting SA02 balance.). A current, reconciled cross-boundary appraisal must test affordable and specialist housing, infrastructure, and other obligations together, using the proposed master-developer/phasing model. Deferring that reconciliation while crediting the full affordable benefit does not answer the Plan's effectiveness test. [Reg19 §4.1, p.17](#).

Question 4 — Capacity for ten or more homes

- 1.1.4. The anti-avoidance intention is clear; the assessment method is not. [HN01 and criterion f\), pp.98–99](#) require efficient land use but do not define how capacity is established. Capacity should be demonstrated through a realistic layout, net developable area, appropriate density, and actual constraints, not simply the applicant's chosen unit count or gross area multiplied by a standard density. The policy should also be clear that development sites should not be artificially split to avoid the affordable housing requirement (“salami slicing”). A consistent evidential requirement is needed to prevent otherwise comparable sites receiving different affordable-housing treatment. [Reg19 §8.1.5, p.34](#).

Question 5 — Tenure split

- 1.1.5. Broadly yes: the evidenced annual need of 310 rented and 111 affordable-ownership homes supports approximately 75:25. But that does not establish that any product within either category will meet need. [EMP-NLP5, affordable-housing conclusions, p.67/PDF p.70](#) identifies substantial social-rent need and warns that First Homes would do little to meet genuine local affordability needs, with smaller shared-ownership homes potentially more effective. HN01 should secure a needs-led product mix, not merely the correct labels. At full 40% provision, its ownership share equals 10% of all homes; any reduction must also be considered against [NPPF paragraph 66 and its exceptions, p.18](#). [Reg19 §8.1.5, p.34](#).

Question 6 — Reviews and flats

- 1.1.6. An upward review is appropriate; the wording is incomplete. [HN01\(e\) and paragraph 6.11, pp.99–101](#) refer respectively to 500 or more houses and dwellings. The policy therefore fails clearly to include flats or mixed schemes. Proposed [AM11.2, p.52/PDF p.53](#) corrects the cross-reference to d), but leaves that discrepancy. [Viability PPG, paragraph 010](#) requires clear review circumstances, process and timing directed towards policy compliance. Agreed review triggers, information and recovery provisions should be included in the policy to secure additional affordable housing when justified; a review mechanism is neither protection of a developer's return nor evidence that the initial policy offer is deliverable. [Reg19 §4.1, p.17](#).

Policy HN02 Housing Need: Mix of New Homes

Question 1 — Evidenced types, tenures and sizes

- 1.1.7. HN02 has the right needs-led principle, but its effectiveness depends on controlling departures. [Criterion 1, p.101](#) permits an alternative mix on evidence satisfactory to HDC without specifying how the unmet need affected by that departure is addressed. At SA02, the applicants leave mix parameters to later engagement and a future framework ([Planning Statement, paragraphs 9.45–47, pp.59–60/PDF pp.61–62](#)). Flexibility over a long build-out is reasonable; it is not evidence of a secured balanced mix. The examination should establish how phase-level changes remain consistent with evidenced district needs and the development-wide housing offer, rather than allowing repeated departures to erode it. [Reg19 §8.1.5, p.34](#).

Question 2 — Table 10

- 1.1.8. Yes, as a starting point rather than a fixed prescription. [EMP-NLP5, Table 6.16 and paragraphs 6.40–44, pp.83–84/PDF pp.86–87](#) supplies the mix and expressly requires attention to local need, existing stock, and turnover. Importantly, HDC's [April 2026 explanatory note, p.1](#) says the newer general housing-mix projections use different, NPPF 2024 growth assumptions and do not directly replace this evidence for the submitted Plan. Updated older-person evidence is relevant. The Council should apply that distinction consistently; neither an obsolete

demographic assumption nor an inapplicable growth scenario should justify a departure from evidenced needs. [Reg19 §8.1.5, p.34](#).

Question 3 — Accessibility: constraints and viability

- 1.1.9. Not fully. [HN02\(2\), p.101](#) recognises site-specific impossibility; criterion 3 contains no equivalent qualification. [Optional technical standards PPG, paragraph 008](#) addresses flood risk, topography, and circumstances where step-free access cannot be achieved or is not viable. The policy should address those exceptional constraints expressly and consistently. That is not a general license to discard accessible homes: the decision must identify the particular constraint, evidence, and affected dwellings. Otherwise accessibility requirements may be presented as firm benefits at allocation stage but relinquished through untested exceptions later. [Reg19 §8.1.5, p.35](#).

Question 4 — National-policy consistency

- 1.1.10. The objective is consistent with meeting different groups' housing needs, but criterion 3(b) needs qualification. It applies wheelchair-accessible M4(3)B requirements to affordable homes generally ([HN02, p.101](#)). [Optional technical standards PPG, paragraph 009](#) limits such local-plan requirements to dwellings for which the authority allocates or nominates occupants. Affordable ownership does not itself establish that condition. The Council should demonstrate the relevant nomination arrangements and express the requirement accordingly. This preserves provision for evidenced needs while avoiding an overbroad requirement. [Reg19 §8.1.5, p.35](#).

Policy HN03 Housing Need: Housing Type and Density

Question 1 — Basis and justification of densities

- 1.1.11. HDC traces 40 dwellings per hectare in the two town centres and 30 elsewhere to the joint land-availability methodology's capacity assumptions ([TPC-NLP8, paragraph 4.3.2, p.11](#)). That explains their origin; it does not establish the optimum density for every allocation. [NPPE paragraphs 128–129, pp.37–38](#) require consideration of needs, infrastructure, accessibility, and

scope for improvement. The figures are defensible minimum starting points, not evidence that peripheral development at 30 dwellings per hectare uses land as effectively as reasonably available, better-connected options. The Plan's spatial justification must demonstrate that distinction, rather than treating compliance with a minimum as sufficient justification for sites such as SA02. [Reg19 §8.2.5, p.46.](#)

Question 2 — Lower-density exceptions

- 1.1.12. No: [HN03, pp.102–103](#) identifies relevant considerations without explaining when transport or service availability justifies going below the minimum. Poor existing accessibility could perversely support a larger land-take and greater car dependence. Assessment should distinguish enduring constraints from deficiencies that development can realistically remedy, identifying the services available when homes are occupied and the resulting justified density. Character remains relevant; lack of provision should not be rewarded without testing improvement. Otherwise the exception can undermine the efficient-land-use purpose explained in paragraph 6.18 rather than implement it. [Reg19 §8.2.5, p.46.](#)

Policy HN04 Housing Need: Supported and Specialist Housing

Question 1 — Ten per cent on suitable sites of 100 or more dwellings

- 1.1.13. It can contribute, but its effectiveness is not demonstrated by the percentage alone. HDC identifies continuity with adopted Policy H4 ([TPC-NLP8, paragraph 5.3.2, p.13](#)), rather than a derivation showing that this rate and threshold meet updated needs. Its estimated 601 specialist homes assumes all relevant allocations are suitable and deliver 10%, including 120 at Gartree Road ([paragraph 5.3.18 and table, p.16](#)). The relevant April 2026 update identifies 1,223 homes with support and 579 with care, separately from 604 care bedspaces ([Table 4.36, p.92](#)). These are not interchangeable units or, without aligned supply and periods, a calculated deficit. They require a reconciled delivery account showing which needs HN04, existing commitments and other provision will meet. An assumed percentage on conditional sites is insufficient. [Reg19 §8.1.5, p.35.](#)

Question 2 — Suitable locations

- 1.1.14. The factors are identified, but timing needs to be explicit. [Paragraph 6.22, pp.104–105](#) requires easy access to services, support, health facilities, and public transport. For phased allocations, those facilities must be accessible when specialist homes are occupied, not merely shown on an eventual masterplan. At SA02, even the precise specialist-housing quantum remains for agreement, as referred to in the Planning Statement for the recently submitted planning application for the site (HDC ref: 26/01350). The Council should substantiate the assumed contribution against the proposed residents' needs, access, and service-delivery programme before relying on it. The issue is the application of suitability, not the absence of any stated factors. [Reg19 §8.1.5, p.35](#).

Policy HN06 Housing Need: Gypsy and Traveller and Travelling Show people Accommodation

Question 1 — Robustness of accommodation needs

- 1.1.15. STNT identifies no substantiated basis for rejecting the underlying needs assessment as a whole; it challenges its translation into policy requirements. HDC's updated [TPC-NLP8, paragraphs 7.3.13–17 and Tables 3–4, p.23](#) records 24 Gypsy/Traveller pitches and 77 Showpeople plots for households meeting its revised definition, alongside undetermined needs of 77 pitches and 37 plots. It says 100% of undetermined need now needs addressing. Proposed [MM15.1 and MM15.6, pp.30–31/PDF pp.31–32](#) instead specify minima of 20 pitches and 62 plots to 2032. Different periods and cohorts must be reconciled, not indiscriminately added. The examination needs a transparent bridge from the assessment to the requirements and supply strategy; a revised headline target alone does not establish that needs have been planned for. [Reg19 §8.2.4.1, p.43](#).

Question 2 — First five years, years 6–10 and 11–15

- 1.1.16. Not for timely Showpeople provision, on HDC's own evidence. [TPC-NLP8, Tables 7–10 and paragraphs 7.3.23–24, pp.25–27](#) projects 22 Gypsy/Traveller pitches in years 1–5, then 13 and 18; its first-five-year calculation gives 5.56 years' supply. For Showpeople it projects only 29

plots initially, against a 61.6-plot requirement: 2.35 years' supply and a rounded shortfall of 33. The later contributions are 21 at Mere Lane in years 6–10 and 36 at Gartree Road in years 11–15. Their combined capacity does not cure the initial deficiency. HDC calls this a timing problem; timely provision is precisely the effectiveness issue. [Paragraphs 7.3.25–26, p.27](#) describe further site investigations and flexibility, not a demonstrated replacement trajectory. Retaining SA02's late contribution cannot establish sound first-five-year provision; deliverable early supply and credible later delivery must be evidenced separately. [Reg19 §8.2.4.1, p.45](#).

Question 3 — Location and distribution

- 1.1.17. Proximity to a settlement is relevant but insufficient on its own. [HN06\(4\)\(c\), p.108](#) does not specify how reasonable proximity translates into usable access to services. The [November 2024 assessment, site 24/8631, PDF p.49](#) assesses Gartree Road but conditions its approximately 36-plot capacity on suitable access and landscape mitigation; it also identifies amenity considerations. STNT therefore challenges the demonstrated suitability of the actual parcel and access arrangements, not the existence of an assessment. A distribution justified by broad settlement proximity cannot substitute for showing that the chosen locations can accommodate Showpeople's residential and operational needs safely and sustainably. [Reg19 §8.2.4.1, p.44](#).

Question 4 — Availability, capacity, accessibility, and deliverability

- 1.1.18. The evidence establishes potential capacity, not a settled delivery route for SA02's contribution. The [2024 site assessment, PDF p.49](#) envisaged possible first-five-year delivery, whereas HDC's later [TPC-NLP8 Appendix B, p.32](#) expressly places it outside that period. The SA02 applicants now discuss a more suitable off-site location without identifying it in that account ([Planning Statement, paragraph 9.71, p.63/PDF p.65](#)). Proposed [AM8.2, p.50/PDF p.51](#) permits consideration of off-site alternatives. Proposed [MM15.2 and MM15.8, pp.30–32/PDF pp.31–33](#) properly require serviced plots, including water, foul drainage, electricity, and suitable access. Those provisions do not themselves establish land availability, works, funding or delivery dates. Before treating SA02 as a reliable housing-needs benefit, the Council must

reconcile the site, capacity, infrastructure responsibilities, and timetable. STNT maintains deletion, while recognising that the Plan must then make credible replacement provision rather than erase the need. [Reg19 §8.2.4.1, p.44](#).

Question 6 — Design guidelines

- 1.1.19. No. [HN06\(4\)\(d\), p.108](#) refers to current good-practice design guidelines without identifying their title, issuer, or version. Applicants and affected communities cannot reliably determine the intended benchmark. The policy should identify the applicable guidance and its relationship to the amenity, utilities, drainage and commercial-use safeguards already in criteria 4(b) and 5. Naming guidance would resolve this clarity defect; it would not resolve the distinct suitability and delivery objections in Questions 2–4. [Reg19 §8.2.4.1, p.44](#).