Homes for Our Future
Greater Cambridge Housing Strategy 2024-2029

Annex 3: Clustering & Distribution of Affordable Housing Policy

Contents

1. Purpose

1.1. This policy sets out the requirements of both South Cambridgeshire District Council and Cambridge City Council with regards to clustering and distribution of affordable housing on new developments. It covers how Social Rent, Affordable Rent and Shared Ownership should be clustered and distributed in relation to other tenures, and how sizes and types of affordable homes should be grouped together.

1.2. The policy does not specifically cover Discount Market Homes, Rent to Buy, or Build to Rent because ultimately, they will be market homes, but it does include how Social Rent, Affordable Rent and Shared Ownership should be placed in relation to those other intermediate tenures and to private market homes.

1.3. The policy should be used to help guide applicants to submit successful planning applications and will be a material consideration in making decisions on applications.

1.4. This policy is set within the Greater Cambridge Housing Strategy's long-term vision and objectives, which in turn reflect the broader priorities of the two councils. In particular it will help to promote health and well-being and tackle inequality through the creation of mixed, balanced, and inclusive communities.

2. Key Principles

2.1. Both Cambridge City Council and South Cambridgeshire District Council are keen that new developments provide mixed, balanced, and sustainable communities. To facilitate this the councils seek, wherever possible, fully integrated mixed tenure housing schemes which are tenure blind/tenure neutral. Support will be given to acceptable levels of clustering and ensuring that the affordable housing is dispersed appropriately across the whole development.

2.2. Clusters of affordable housing should contain a mix of affordable tenures so that Social & Affordable Rent and intermediate units are not grouped separately from each other. This equitable cluster placement and good design will help create tenure blind clusters.

2.3. Additionally, the clusters should usually contain a mix of unit sizes, for instance a mix of 1, 2, 3, and 4-bedroom homes. This should help increase opportunities for different sizes and types of households to mix and can help to prevent similar household types being grouped together which may cause, for example, areas of high child density, groups of residents with similar economic backgrounds or with high support needs.

3. Policy

Local Plan Policies: Cambridge Policy 45 & South Cambridgeshire Policy H/10
Cambridge City - Requires affordable housing to be of *"tenure blind design indiscernible from and well-integrated with the general market housing."*
South Cambridgeshire – Requires affordable housing to be provided in *"small groups or clusters distributed through the site".*

Clustering

3.1. **Small or rural parcels of up to 30 units (except for 100% exception sites):** Houses - maximum clusters of 6 to 8 units. Blocks of flats – Maximum of 12 flats in a block with access from a lift or common stairwell. Ground floor flats should have their own entrances, if possible, as they are likely to be allocated to older or disabled residents or families with children.

3.2. **Medium mixed tenure residential parcels of 30 to 200 units:** Maximum clusters of 15 units, whether houses or flats. Clusters should not abut each other, and should be dispersed appropriately across the whole development. This will include blocks of flats that share a lift/stairwell. Ground floor flats should have their own entrances, if possible, as they are likely to be allocated to older or disabled residents or families with children.

3.3. **Large mixed tenure residential parcels 200 units and over:** Maximum clusters of 25 units per parcel, whether houses or flats. Clusters should not abut each other where it results in exceeding the maximum cluster size and should be dispersed appropriately across the whole development. Blocks of flats to have a maximum of 15 units sharing a lift/stairwell. Ground floor flats should have their own entrances if possible as they are likely to be allocated to older or disabled residents or families with children.

3.4. Where a development site is to be built out in separate phases/parcels developers must take account of the location of affordable homes within neighbouring parcels of land to ensure clusters do not adjoin each other and

are well dispersed across the development as a whole. They should also take account of the location of any existing affordable housing which may be adjacent to the site.

Tenure distribution

3.5. Clusters should contain a mix of affordable tenures, to include rented and intermediate tenures.

3.6. Care should be given to placement of different tenures in blocks of flats to ensure a balance between tenure-blind design, ease of management and aiming to keep service charges to a minimum but avoiding too much segregation. However, social or affordable rent homes having different internal communal areas, stairwells and/or lifts as other tenures will generally be acceptable, provided it is clearly done for ease of management and to keep service charges at reasonable levels, and provided the overall design of the scheme remains tenure blind.

3.7. There may be occasions where splitting the tenure type would be detrimental to the wellbeing of the residents. One such instance would be a number of units designated for over 55's, which may benefit being sited together to ensure interconnected similar lifestyles and more efficient provision of any necessary care and/or support, providing they are designed and located so that they integrate well with the rest of the development.

Unit size distribution

3.8. Clusters should contain a mix of unit sizes. Care should be taken to refrain from placing more than 3 to 4 larger units together; preference is to intersperse the larger units with smaller 1 or 2 bed units.

3.9. For flats, if possible, there should be a mix of unit sizes in blocks and on each floor.

3.10. Finally, at all stages of design, service charges levels should be considered. High service charges will increase the risk of the affordable units being unaffordable.

3.11. It is recommended that there is early engagement with the relevant council's Housing Strategy Team (before the pre-app process starts) and with the Registered Provider. This will help to ensure that a timely agreement on the distribution of the affordable housing can be reached. It is also expected that the applicant will provide a robust Affordable Housing Statement to be

submitted with the application. It will need to cover the reasonings for placement and tenure/size distribution of the affordable units across the development and how these are expected to contribute towards a mixed, balanced, and sustainable community.

3.12.   For some schemes both councils will seek to implement and publish a Local Lettings Plan (LLP) detailing how applicants should be prioritised for the allocation and letting of the Social and/or Affordable Rent homes. An LLP, such as for initial allocations on new larger developments, will help to achieve broader objectives for creating mixed and balanced communities, or can help to address or prevent particular issues from arising in a local area. The LLP will need to be discussed and agreed by all parties involved.

Affordable housing distribution across sites

3.13.   To prevent large clusters, promote tenure neutrality and help provide mixed, balanced, sustainable communities, we expect affordable housing to be dispersed appropriately throughout the entire development.

3.14.   The affordable housing should be optimally distributed throughout the site to prevent tenure 'monocultures. It should also be located fairly and equitably in terms of access and proximity to on-site amenities such as open space, play space and access to community facilities.

3.15.   On phased developments or large developments split into parcels of land, the location and clustering of affordable housing on neighbouring parcels should be taken into account to ensure the even distribution of affordable housing clusters throughout the area as a whole.

3.16.   Similarly, the location and clustering of any existing affordable housing which is adjacent to and in close proximity to the site should be taken into account when deciding the positioning of affordable housing on the site. H

3.17.   Homes of all tenures should be represented in equally attractive and beneficial locations

4. Exceptions to policy

4.1. Exceptions to policy may be justified because of the type or scale of the development. For example: if the scheme is very small or in an area of a particular character; 100% affordable housing schemes because of their built form (for example if the development is all made up of high-density flatted

blocks); or specialist, supported or age-related schemes where critical mass is needed.

4.2. In some instances the councils may consider proposals to go above the clustering thresholds referred to in the policy where it is satisfied that the affordable homes are proportionally distributed within the wider scheme, or where there are no noticeable concentrations of affordable housing in a particular area which could potentially result in a non-inclusive community in the long term.

4.3. The design, layout and management of the homes will be key considerations in determining proposals that exceed the clustering numbers. The onus will be on the developer to provide a robust Housing Statement alongside the planning application. It must specify the reason why the scheme deviates from this Policy and further describe how they intend to ensure the scheme links with the councils' Key Principles above. The developers will also be expected to demonstrate how the homes integrate with nearby existing communities.

4.4. We recognise that Local Lettings Plans can help to ensure a mixed and balanced scheme, and help to mitigate against having larger clusters or on schemes of 100% affordable housing. An LLP, together with a robust management plan, must be agreed prior to occupation. However, in assessing whether an LLP provides sufficient mitigation, the councils will also take into account the fact that an LLP for a new development will normally, due to its nature, lapse once all the homes have been let for the first time.

5. Background – national policy and guidance

National Planning Policy Framework

5.1. The National Planning Policy Framework (NPPF) (published in September 2023) says: *"planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other"*, and which are *"safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion."*

National Design Guide

5.2. The National Design Guide 2019 (updated in 2021) is expected to be read alongside National Planning Policy Guidance (Design: process and tools,

updated in 2019). It sets out the characteristics of well-designed places and demonstrates what good design means in practice.

5.3. Its purpose is to *"illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice".* It aims to avoid features that could create actual or perceived barriers, or contribute to segregation, both within the development and its surroundings.

5.4. It states that where different tenures are provided they should be well-integrated and designed to the same high quality to create tenure neutral homes and spaces.

5.5. Part of the Guide's definition of 'tenure neutral' includes there being *"no segregation or difference in quality between tenures by siting, accessibility … etc".* Also that *"homes of all tenures are represented in equally attractive and beneficial locations."*

Charter for Social Housing Residents (Social Housing White Paper)

5.6. The Charter for Social Housing Residents - Social Housing White Paper published in November 2020 looked to address issues of inequality for social housing tenants. Within the Charter there is a focus on ensuring integration of social housing in communities which aligns with the objectives of this Clustering and Distribution Policy.

5.7. *"It is vital that social housing is treated as an integral and valued part of our housing system, rather than being separated or segregated from other forms of housing".*

Cambridgeshire Horizons – Balanced and Mixed communities – A Good Practice Guide.

5.8. The Cambridgeshire Horizons document also reflected that there is no obvious 'best' method of mixing tenures, but that 'ghettos' of affordable housing are best avoided.

5.9. Twelve (12) units per stairwell/lift was originally based on the Homes & Communities Agencies Design Guide, which said that a maximum of 15 units should share a stairwell/lift. The councils have taken the approach for a number of years that all schemes should have a maximum of 12 units to a stairwell and this has worked for us and the Registered Providers. However, we recognise this may not be possible on larger, higher density schemes and the policy has been amended for medium/large schemes.

Response from Registered Housing Providers

5.10.   In 2021 the councils undertook a survey with Registered Providers who have stock in the areas of Cambridge City and South Cambridgeshire. The responses were very clear that they preferred to have clusters that are easy to manage and distributed evenly across sites. They preferred a mix of tenures and house types within a cluster to ensure a mix of single person households, couples, and families. They preferred that larger properties were not grouped together since this will lead to high child densities which can result in high cases of Anti-Social Behaviour.

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