



Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Date: 22 January 2020

Our Ref: LS M5/0911-17

By email only:
local.plan@stroud.gov.uk

Dear Sir/Madam,

RE: STROUD DISTRICT LOCAL PLAN REVIEW DRAFT PLAN

We represent the **South West Housing Association Planning Consortium** which includes all the leading Housing Association (HAs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help to deliver the wider economic and social outcomes needed throughout the South West region.

Affordable housing definition

The Government published the revised NPPF in February 2019 which included a new definition of affordable housing at Annex 2 with a number of new categories aimed at widening the scope of the definition to include a wider array of tenures to assist people into homes that meet their needs. Affordable tenures now include affordable housing for rent, starter homes, discounted market sales housing and other routes to home ownership including shared ownership, relevant equity loans, low cost homes for sale and rent to buy products.

It does not appear that the Local Plan Review has accounted for this update to the affordable housing definition. The review of Policy CP9 does not refer to the up-to-date definition, neither does it redirect the reader to the NPPF. In addition, paragraph 1.4 of the Local Plan Review indicates that a glossary is provided in the appendices to explain the technical terms. However, this does not appear to have been provided in the consultation document alongside the other appendices and so it is not clear if the Review has taken the new definition into account. The existing Local Plan glossary contains the out of date definition for affordable housing. The Local Plan Review must recognise the updated affordable housing definition in order to ensure that all needs are properly considered.

Evidence base

The update to the definition of affordable housing will necessitate a new Strategic Housing Market Assessment (SHMA). The SHMA 2015 Update cannot be relied upon as a sufficient and robust evidence base as it does not account for the revised definition and is therefore out of date. The number of households considered in need will change as a result of these altered definitions and it will be important to ensure that all needs are properly considered. An area-specific assessment should be completed in direct discussion with local housing associations to ensure that the practical implications of the new tenures are fully considered, including the implications of these tenures on meeting local needs, and development viability.

It is important that the Council reassesses the need for affordable housing across the authority **as a whole** in light of the revised NPPF, as the definition changes the types of households whose needs will now be considered as requiring a form of affordable housing.

Overall unadjusted need for affordable housing

We are pleased to see that the Local Plan Review continues to give an explicit numerical need figure for the delivery of affordable housing. This is a positive feature of Policy CP9 as it allows for specific and measurable analysis of affordable housing delivery against need.

We note that the existing Local Plan gives an overall unadjusted need figure of 446 affordable dwellings per annum, robustly evidenced by the 2015 SHMA update. However, the Review expresses a revision to this figure, proposing a lower figure of 425 affordable dwellings per annum. It is not clear where this reduced figure of 425, 21 dwellings per annum fewer than the existing need figure, has been sourced from as there has been no update to the 2015 SHMA.

The significant unmet need for affordable housing means that the Council should take a proactive approach to welcoming the delivery of affordable housing. We encourage the Council to set ambitious targets for affordable housing as a mechanism to significantly increase delivery and improve affordability across the area, provided these are supported by a robust viability assessment. As the overall unadjusted need figure of 425 proposed in this Review does not appear to be justified with an up-to-date evidence base, the existing need figure of 446 should remain.

Affordable housing distribution

We recommend that the Council includes some policy discussion on the distribution of affordable housing within developments and their integration with overall design as a specified maximum group size or range is useful knowledge for applicants.

Permitting small clusters of affordable housing at a group size of approximately 10 to 15 dwellings is typically preferred by Registered Providers, as this level of distribution assists with the management and maintenance of affordable housing. Clustering can be achieved while delivering visually indistinguishable housing products that are well dispersed throughout developments.

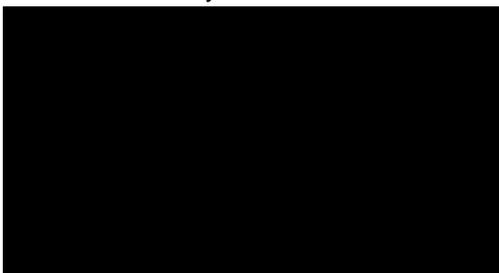
Policy DCP2 – Supporting older people

We support the Council's decision to introduce new policy text in support of older people, particularly the aim to increase the range of housing options available for older people. To improve this policy or as an addition to Policy CP9, the Council should look to specify the circumstances in which they would expect specialist housing to provide affordable housing.

If the Council expects developments that are classified as residential institutions (C2) to contribute to the delivery of affordable housing in the District, this should be fully justified in relation to need and viability and should provide an appropriate level of flexibility.

We would like to be consulted on further stages of the Local Plan Review and other publications by the authority, by email only to consultation@tetlow-king.co.uk. Please ensure that the **South West Housing Association Planning Consortium** is retained on the planning policy database, with **Tetlow King Planning** listed as its agent.

Yours faithfully



For and On Behalf Of
TETLOW KING PLANNING



cc: Aster Group
GreenSquare Group Ltd
Guinness Partnership
Sovereign Housing Association
Stonewater Ltd

