



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

Date: 21 July 2021
Our Ref: LS M5/0911-17

By email only:



Dear Sir/Madam,

RE: STROUD DISTRICT PRE-SUBMISSION DRAFT LOCAL PLAN

We represent the **South West Housing Association Planning Consortium** (HAPC) which includes leading Housing Associations (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 deliver the wider economic and social outcomes needed throughout the South West region.

As significant developers and investors in local people, the HAPC is well placed to contribute to local plan objectives and act as long-term partners in the community. Our clients play an active role in affordable housing delivery in Stroud and so welcome this opportunity to contribute to the local plan.

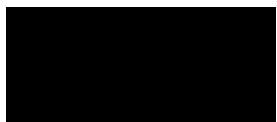
We are pleased to see that the Council has continued to pursue the Local Plan Review. On 29 April 2021, Stroud District Council approved the Pre-Submission Draft Local Plan for publication. We welcome the further opportunity to comment on the emerging local plan, with our comments below being made in relation to Part 4 of the Pre-Submission Draft Local Plan with regard to Homes and Communities.

The Evidence Base

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.

In response to the Local Plan Review Draft Plan consultation, we submitted comments detailing how important it is that the Council assesses the need for affordable housing in light of the revised NPPF, as the definition changed the types of households whose needs will now be considered as requiring a form of affordable housing. Considering this, we are pleased to see that the Council has recognised this update to the national definition and published a new Local Housing Needs Assessment in September 2020 to support the Local Plan Review since the last round of public consultation.

The Gloucestershire Local Housing Needs Assessment (LHNA) 2019 specifies at Figure 3 a need for 8,476 new affordable homes in Stroud across the 20 year period between 2021 and 2041. The same table states that 3,291 affordable homes are currently planned for in Stroud. 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.



Policy DCP2 – Supporting Older People and People with Mobility Issues

We agree that new housing development should be of a high quality in terms of its design and resilience, and provide adequate space to achieve good living standards, as required by the NPPF. Policy DCP2 states that “67% of both market and affordable homes market homes should be accessible and adaptable by meeting requirement M4(2) Category 2 of the Building Regulations and 8% of both market and affordable homes should be to M4(3) Category 3 of the Building Regulations.”

We accept that there is a growing need for properties which comply with Part M(2) or Part M(3) of the current Building Regulations, as highlighted by the Gloucestershire LHNA 2019, and so we support this policy direction, although we would like to remind the Council how the increased delivery of such properties may affect viability and overall affordable housing delivery in Stroud. We appreciate that this part of the policy is clear and specifically defines what proportion of housing on site is expected to meet each category of the Building Regulations as this removes uncertainty for applicants.

Policy CP9 – Affordable Housing

It is great 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.

There has been a slight decrease in affordable housing need since the previous local plan consultation from an overall unadjusted need figure of 446 affordable dwellings per annum (evidenced by the 2015 SHMA update) to 424 affordable dwellings per annum, evidenced by the Gloucestershire LHNA 2019.

The minimum Local Housing Need (LHN) for Stroud is calculated as 638 dwellings per annum capped or 652 dwellings per annum uncapped, as shown in Figure 1 of the Gloucestershire LHNA 2019. An affordable housing need of 424 affordable dwellings per annum is significant in comparison to the minimum LHN representing 67% of LHN, however, the Council's Viability Assessment demonstrates that only 30% affordable housing provision on site is viable. The PPG states (Paragraph: 010 Reference ID: 2a-010-20201216) that the Standard Method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. Also set out in the PPG, “an increase in the total housing figures may be considered where it could help deliver affordable housing” (ID 2a-024-20190220). We acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.

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. We therefore support the Council's affordable housing target of 30% on site seeing as this appears to be the highest viable figure, however, we recommend that the pre-fix 'at least' is removed from the policy wording as this makes the policy too ambiguous for the reader.

Given that the Council has identified the potential to deliver affordable housing in rural areas, we support the Council in setting a 30% affordable housing threshold on sites of four or more dwellings in the AONB or Designated Rural Areas where this is achievable, and viable.

We note that Policy CP9 is silent on the matter of financial contributions. The Council's policy approach should be more flexible so that where on site affordable provision is not possible, appropriate commuted sums for off-site provision is instead acceptable. This will help to ensure that affordable housing is still provided through other avenues when it is not possible to do so on site.

We are pleased to see that the Council is prepared to enter negotiations on tenure, size and type of affordable units on a site by site basis, having regard to housing needs, site specifics and other factors. This is particularly important seeing as the support text at paragraph 4.20 suggests that it may not always be viable for sites in Stroud to reflect the needs identified in the Gloucester LHNA 2019:

“...the LHNA indicated that the majority of need for affordable housing is for affordable or social rented properties. However, viability evidence indicates that a tenure split of 50% affordable rent and 50% affordable home ownership tenure would be viable for the majority of sites.”

This approach in the viability evidence satisfies paragraph 64 of the NPPF which expects at least 10% of homes to be available for affordable home ownership. Although the Written Ministerial Statement dated 24 May 2021 also requires 25% of affordable housing to be First Homes. Albeit this requirement does not need to be reflected in a development plan policy if the development plan is submitted to the Secretary of State by 28 December 2021 under the transitional arrangements.

We hope that Stroud District Council will continue to support shared ownership as an affordable home ownership tenure as it provides an invaluable role in assisting home ownership and enabling households to join the housing market with small deposits. Shared Ownership is flexible and well-established affordable homeownership product that enables staircasing up to full ownership.

We are pleased to see that the Council is preparing a Supplementary Planning Document which will give more detail as to how Policy CP9 will be implemented.

Policy HC4 – Local Housing Need (exception sites)

We support the Council in its proposals to introduce exception sites. The inclusion of exception site policies can help guide development adjacent to settlement boundaries to ensure that housing growth is planned in a sustainable manner and complements the existing settlement. The Council should seek to maximise supply of affordable housing by supporting rural exception sites and the delivery of affordable housing-led schemes where these target identified needs. Exception sites have been widely welcomed as an addition to the opportunities Housing Associations have to meet housing needs in areas that may not otherwise have been considered suitable for general housing proposals. Both policy tools enable the delivery of affordable housing to meet identified need.

We are pleased to see that the Council will allow cross-subsidy on exception sites with an element of market housing in order to facilitate affordable housing delivery. This will help to get more people into the homes they need more quickly, while supporting the Council's wider housing land supply aims.

Policy DHC4 – Community-led Housing

We are pleased to see that the Council have included a new policy that supports the development of housing schemes that are initiated by local communities. We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people, particularly in rural areas. Stroud Council may find it insightful to know that a number of the SW HAPC housing associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England.

The above comments are intended to be constructive, to ensure the policies are found sound at examination. We would like to be consulted on further stages of the above document and other publications by the Council, by email only to [REDACTED] please ensure that the **South West Housing Association Planning Consortium** is retained on the consultation database, with **Tetlow King Planning** listed as its agents.

Yours faithfully

[REDACTED]

BSc (Hons) MSc

PLANNER

For and On Behalf Of

TETLOW KING PLANNING

[REDACTED]

cc: ■ Aster
GreenSquareAccord
Guinness Partnership
Sovereign
Stonewater

■ Housing Strategy and Community Infrastructure Manager
– Senior Housing Strategy Officer