

Communities Housing Projects and Strategy Memorandum

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Team Leader**

**To: Joann Meneaud
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Date 06 June 2022

Copy to: Neil Coles; Michelle Wheatley; Adam Gooch.

Re: Land At Hill Farm, Hempsted Lane, Gloucester,

**Ref: 20/00315/OUT -
APP/U1620/W/22/3296510**

Housing Strategy (Affordable Housing) Comments

Summary

As stated in the previously submitted consultation response all the following comments are caveated by the overall suitability of development on this site, it is NOT an allocation within the City Plan and currently the site lies within the Cordon Sanitaire and would not be deemed suitable for development. The applicant themselves highlight within their Affordable Housing Statement the City Council's ambitions is "The delivery of sufficient affordable housing, of the appropriate types in the appropriate places".

The following comments are premised on this fact and reflects comments on the generality of housing and affordable housing in the City and should not be considered as supporting development of this particular site.

The applicant sets out the need for the delivery of Affordable Housing in the City, the application provides no detail beyond the 49 Affordable Homes provided, that addresses the particular needs of the City. A tenure mix is proposed later in the document that addresses the needs of the City and reflects the National Planning policy Guidance as well as key local policies.

Discussion with the applicant have suggested they would be happy to agree a mix that reflect the City's priority housing needs, and this detail statement should be

included to allow the Council's Planning committee to understand the value of the proposed affordable housing and how it complies with the Council policy position. This detail could then be replicated with any legal agreement unilateral submitted as part of the appeal. Subject to the detail the proposal of aligning with the recommended mix this would be an acceptable approach to ensure the Affordable Housing meets the needs of the City.

The applicant needs to address the issue of suitable design, by way of compliance with Nationally Described Space Standards and the provision of Accessible and Adaptable homes in line with the Gloucester City Plan policies F6 and A6.

2. Housing Policy and Strategy

The City Council adopted its [Housing and Homelessness Strategy 2020-25](#) in 2020, which states the following aims:

1. To increase the supply of homes
2. Make best use of existing stock
3. To reduce homelessness and rough sleeping

A key focus of the strategy is to enable the provision of adapted, and specialist housing supported by commissioners. This is reflected in our current policy positions in the [Joint Core Strategy](#) and emerging [Gloucester City Plan](#).

The [Joint Core Strategy](#) and emerging [Gloucester City Plan](#) have several policies surrounding the type and mix of housing and design, and the requirement to meet the needs of Gloucester's population.

Joint Core Strategy Policies

SD3: Sustainable design and construction

SD4: Design requirements

SD10: Residential development

SD11: Housing Mix and Standards

SD12: Affordable Housing

Emerging Gloucester City Plan Policies

A1: Effective and efficient use of land and buildings

A2: Affordable Housing

A5: Specialist Housing

A6: Accessible and adaptable homes

F6: Nationally Described Space Standards

SD12 of the joint Core Strategy requires a minimum of 20% Affordable Housing. The Local Housing Needs Assessment identifies need above this, demonstrating that 36% of total supply should be Affordable Housing. The City Council will support schemes that deliver levels of affordable housing greater than 25%.

3.The need for Affordable Housing and current supply

The applicant sets out a strong argument for the provision of affordable housing which is well understood by both officers and members of the City Council There is substantial need for housing and in particular Affordable Housing in the City and County as a whole and the recently adopted Joint Core Strategy has tested the evidence base in relation to the objectively assessed housing need and affordable housing requirements.

The applicant makes reference to the Local Housing needs Assessment of which the final iteration indicates for Gloucester that out of its annual housing requirement a split of 64% market housing to 36% Affordable Housing.

It is important to note the distinctions with the need for rented accommodation. The evidence base has now identified that 40% of the Affordable homes should be Social rent with 26% as Affordable Rent total rented requirement of 66% of the affordable housing the remainder being affordable homeownership. The LHNA also breaks the requirement down in terms of the sizes of homes required. The long-term view of the LHNA need to be set against the immediate need evidenced within the waiting list, the latter demonstrating the need for larger family homes as a priority.

The Council's current position is set out in SD11 in terms of meeting local needs and so the applicants needs to be mindful of the latest evidence relating to tenure, type and size of accommodation required. This includes market and as well as Affordable.

SD11 requires suitable homes to meet locally arising need and the City Plan will detail this in terms of adaptable and adapted homes, the plan has detailed a 25% position on category M4(2) homes i.e. adaptable homes and 4% of the Affordable housing should be provided as Category M4(3) homes (wheelchair standard).

In terms of need there is a justification for a higher position as set out within the Local Housing Needs Assessment 2020, the outcome of the Examination in Public is that a 25% position will ensure the City Plan is deliverable.

JCS Policies SD11 and SD4 also provide justification for this approach. The City plan provides more detail and a reasoned justification for this detail.

The provision of M4(20 and M4(3) standard homes should be conditioned to ensure Building Control confirm that the relevant standards have been met.

Any applicant should show how the development will meet the need of an aging society in particular how the homes will encourage older persons in the development, over and above the part M mandatory requirements. Any stated approach will need to show compliance with SD11 and design requirement stated the JCS SD4. Since these comments were made in pre-application advice this issue has not been addressed.

SD12 sets out a 20% minimum contribution of affordable housing and is clear on what action need to be taken if this cannot be achieved. It also states that some site may deliver higher levels of Affordable Housing than the minimum.

The City Plan viability report indicates a a range of vaiabilitie across different site typologies that indicated that some sites can deliver above SD12’s minimum 20%.

It should be noted that this site is not allocated within the City Plan and is sited with in a higher value area of the City.

The Table below sets out the conclusion of the latest revision of the Local Housing Needs Survey It should be noted that a range of open market units are required,

After Figure 86 LHNA May 2020 : Overall need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding) Affordable Housing Need Planned							
	Beds				Totals		
	1	2	3	4+		% Of AH	% of all Homes
Social Rent	87	874	645	215	1821	40%	14%
Aff. Rent	170	554	376	119	1219	26%	10%
Shared Ownership	39	796	641	91	1567	34%	12%
Total	296	2225	1661	425	4606		36%
Market Housing	100	1066	5139	1816	8121		64%
Total	396	3291	6800	2241	12728		100%

Whilst the applicant has eloquently stated the case for affordable homes in order to be complaint with either City Plan nor JCS Policy SD11 the proposal need to provide detail on the mix of affordable tenures and the types and sizes of Affordable homes to be provided on the site. The above evidence alongside the Housing Register provide clear indication that compliance with 10% Affordable Home Ownership set out in paragraph 64 of the NPPF would “ significantly prejudice the ability to meet the identified affordable housing needs of specific groups”.

Based on a quantum of 49 Affordable Homes the following table sets out the desired tenure and type of Affordable Housing the number in housing need on the housing register and the number of lettings occurring each year:

	1	2	3	4	5	6	Totals
Social Rent		6	9	4	1	1	15
Affordable Rent	12						12
Total Rent	12	6	9	4	1	1	27
Affordable Home Ownership		8	7	1			16
Total Affordable Housing	12	14	16	5	1	1	49

Expressed as percentages:

	1	2	3	4	5	6
Social Rent		30%	40%	20%	5%	5%
Affordable Rent	100%	0%	0%	0%	0%	0%
Total Rent	38%	19%	25%	13%	3%	3%
Affordable Home Ownership		53%	41%	6%		

The previous consultation response dealt with the issue of market homes mix and site viability.

Subject to the applicant provide a detailed mix of affordable housing that in line with the types and tenure set out the Affordable Housing provision would be deemed acceptable.

4. Affordability

The applicant needs to be aware of the issue of increase in open market values leading to Affordable Rents being higher than the Local Housing Allowance, in these circumstances the Council would expect the rents to be below the 80% level and in line with the Local Housing Allowance, in order to ensure tenants in receipt of Housing benefit can afford the homes. The same applies in relation to the combination of Service Charges and Social Rents. The tenure mix set out an approach in relation to Social rent, that focuses on the affordability issues for families, in particular the Welfare benefits cap. Social rent also incentivises employment.

The applicant also needs to be aware of the entry level to open market housing in the City as set out in the SHMA. Open market values on the site will impact upon the affordability of Affordable Home Ownership and in particular the level of shared ownership tranches on initial sale and any discounted housing sales values. Any legal agreement or Unilateral should address the requirements relating to rent levels and affordability.

5. Design of Affordable Housing

The latest City plan policy identified the Nationally Described Space Standards as the expected size standard for housing within the City.

The Requirement of 25% of all housing to Category M(4)2 standard housing, this would equate to 61 homes. As this over and above the 49 Affordable Homes the applicant need to confirm compliance with this policy across tenure. and 4% of the Affordable Homes to category M4(3)b should confirmed by way of the related legal agreement/unilateral. All ground floor flats and or bungalows would be expected to comply with M(4)2Category. Unless appropriate lift access is planned, can be confirmed upper floor flats are not required to meet the M4(2) standard.

	1	2	3	4	5	6	Totals
NDSS requirement 1 storey Sqm	50	70	86				
NDSS two storey Sqm		79	93	124	128*	132*	
Category M4(2) no. Affordable (min.)	6	14	16	5	1	1	43
Category m4(3)b	1						

*The council expects all rented homes to provide double bedrooms in order that they are flexible to meet the variety of demand on the housing register and allow for family growth. The NDSS does not provided for 5 bed 10 person or 6 bed 12 person units and the council will wish the legal agreement o reflect the need to deliver larger size homes.

As part of the Joint Core Strategy Affordable Housing Partnership advice has been sought from the Preferred Providers on the specification items they would require, above building regulation compliance, for affordable housing units.

Individual Preferred Providers may negotiate specification upgrades above the partnership standard, which would be assumed to be at their cost. The design and specification of Affordable Housing is critical to the homes being fit for purpose and a Housing Association Registered Provider being willing to contract on the homes provided.

The applicant was provided with the JCS –AHP Guidance Note that is used to support the Section 106 and application of affordable housing planning policies. No reference is made to any standard within the Planning Statement and the Affordable Housing Statement. Ensuing the standard of design meet the requirements of Housing Association Registered Providers is key to effective provision of on site Affordable Housing and long term effective management.

As already stated providing 25% of all units TO category two reflects both the LHNA evidence, policies SD11 and SD4 City Plan policy A6. In addition to this 4% of the Affordable Housing units should be built to Category M4(3) standard i.e. suitable for a wheelchair user. Such homes can be house and or flats. The evidence for this provision is now set out within the latest version of the LHNA

6. Density of Affordable Housing

It would be expected to have clusters of no more than 6 to 8 Affordable Units in a cluster, subject to the quantum being delivered on the site and design requirements for example blocks of flats. A suitable clause within the legal agreement S106 agreement/unilateral should detail this requirement. A master plan of the site would show how this could be achieved to ensure the development is mixed and balanced community.

7. Liaison with Registered Providers

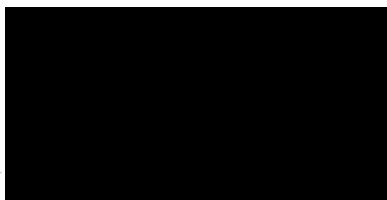
It is not known if any discussions have occurred with providers. This is of particular importance with regard to suitability of design and space standards to ensure the developer can contract on the homes once built, ensuring that the units are fit for purpose is a key element of ensure the homes will be suitable affordable housing in perpetuity. The council has a list of preferred providers as part of the Joint Core Strategy Affordable Housing partnership and is recommended that the applicant approaches some or all of these Housing Associations Registered Providers to discuss the suitability of their proposals.

8. Off Site Contributions

The National Planning Policy Framework identifies that planning authorities should seek on site contributions. The National Planning Policy Framework identifies that planning authorities should seek on site contributions. Any agreement to an off-site contribution needs to be robustly justified. There would not appear to be any reason for off-site contributions on this site.

It is the Council's position that appropriate design, mix and location of affordable housing in addition to discussion with Registered providers at an early stage will ensure that a Housing Association Registered Provider will contact the owner/developer on the Affordable Housing. As such no cascade mechanism for a commuted sum will be entered into.

Yours sincerely



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