



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

Date: 18 January 2019

Our Ref: AG M5/0911-16

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

RE: STROUD DISTRICT LOCAL PLAN REVIEW – EMERGING STRATEGY PAPER

We represent the **South West Housing Association Planning Consortium (SW HA PC)** which includes the leading Housing Associations operating 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.

General Comments

The Government published the revised NPPF in July 2018. The changes include a new definition of affordable housing 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.

This will necessitate an update to the Strategic Housing Market Assessment, as the numbers 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.

Questions 1.0a and 1.0b

With regard to **Question 1.0b**, as housing associations are such key parties in the delivery of affordable housing, it would be appropriate in the emerging plan to also refer to working with providers of affordable housing to emphasise the Council's proactive approach to maximising the supply of affordable housing in Stroud.

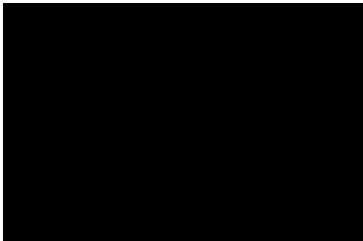
The significant unmet need for affordable housing, means that the Council needs to continue to take a proactive approach to welcoming the delivery of affordable housing. Incorporating the wider definition of affordable tenures will be important in ensuring consistency with the revised Framework, and this must be done with the support of a new assessment of how these tenures will meet local housing needs, including any measures required to ensure that all needs are addressed.

The revised affordable housing policy should reflect the NPPF in encouraging a more diverse housing stock, whilst enabling the delivery of sufficient numbers of housing to improve the ability of developers to deliver an appropriate and higher quantum of affordable housing. This must now include an allowance for at least 10% of dwellings on major developments to be delivered as affordable home ownership, where this will meet local needs and deliver viable schemes.

Similarly, when drafting the new policy, it is important for this to consider the most effective wording that *encourages* and *enables* delivery of affordable housing, without placing unnecessary restrictions and additional hurdles to frustrate delivery. 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.

The introduction of entry-level exception sites in the NPPF is a welcome 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. We encourage the Council to introduce a locally specific policy on these that enables delivery of affordable housing-led schemes that are aimed at first-time buyers and renters and seek to allocate land specifically for these sites to encourage further delivery. It is important to note that unlike the policy on rural exception sites the NPPF does not seek to secure affordable housing delivered on entry-level exception sites *in perpetuity*, so it would be inappropriate to require this in a local policy.

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 HA Planning Consortium** is retained on the planning policy database, with **Tetlow King Planning** listed as their agents.



TETLOW KING PLANNING

consultation@tetlow-king.co.uk

Cc: Aster Group
Clarion Housing Group
GreenSquare Group Ltd
Guinness Partnership
Sovereign Housing Association
Stonewater Ltd

Housing Enabling Officer

