

## **Minchinhampton Parish Council. Housing Needs.**

### **Additional thinking for the Review on the 7<sup>th</sup> March 23**

Some of what follows may slightly overlap and repeat previous submissions for clarity. However, there is value in having all the thinking in one place.

The latest Housing Needs Assessment for the whole Parish was prepared without authority in November 2020 to support development proposed in the Knapp. Its conclusions were extremely partial, in our view, not least because the data it used was at least 10 years out of date. It therefore ignored some significant development in the intervening period – ( e.g. the Tynings/ Old Common rebuild.) It was however reviewed by the Inspector appointed to consider the appeal. **APP/C1625/W/22/3300819** who concluded, at point 23, that an affordable provision of about 8 dwellings pa. was appropriate. What is not clear from his deliberations is whether that is to cover ALL the development in the Parish, market speculative new housing stock and the nominal 30% affordable element that comes in on the back of it through planning control.

Given that an additional 8 units p.a. is more-or-less the historic provision rate of new housing in the Parish going back over some 30 years or more then we can reasonably conclude he means ALL development. To think otherwise would encourage over-development by a ratio of 3 to 1.

Whist the Council has not had the opportunity to challenge that conclusion, it feels that at this stage any attempt to do so would prove both unhelpful and time-consuming.

Significantly the 100+ dwellings currently in construction at Wimberley Mill in the north of the Parish has NO affordable element, the developer having argued a case that brownfield clean-up costs rendered any provision unviable. The Parish Council would have argued against that, perhaps trading increased density for additional social rental or shared ownership units; of course, we were never consulted as that conversation took place in a very restricted forum away from public gaze. The same would be true of any development discussion.

The Piper Homes HNA does however show that there cannot be any such thing as affordable private market provision in the Parish as land value expectation, and reality, is above any deliverable starting point. The Parish Council is fully aware of that and has started to look for solutions outside market forces. Planning controls, taxing development to deliver 30% affordable even at a controlled 80% of average value, using Social Residential Providers, will have a starting point on land cost which makes even minimal units unaffordable. Even pony paddocks are worth significantly more than exception site value.

The District Council allocates Social Rental Housing using a points-based system called Home-seeker-Plus. That usefully functions on a District wide basis, so the logic in relation to provision has to be to build on lower land-cost areas, or use landbanks controlled by sympathetic owners. In that regard adjoining District Councils can share supply. The unavoidable logic of Home-seeker is that if you use it on a District wide basis, or even County wide, then it should be a District wide solution that services it.

We realise that the Inspector is considering the Local Plan on a Stroud District-wide basis only, and Home-seeker does not form any part of Planning policy, within the parameters of the Enquiry. Nor indeed is the affordable provision in adjoining District Councils (ie. Cotswold District Council) a part of any immediate consideration.

Suffice it to say that Home-seeker is used by ALL the Gloucestershire authorities in the allocation of social accommodation, which means that property in Minchinhampton does not necessarily go to those with local connections, as has been demonstrated recently in the new SDC build in Summersfield Road, where not one of the seven units went to anyone with demonstrable local connections.

17 units have just been completed in Avening, the adjoining parish in Cotswold District.

We argue therefore that, given adequate transport availability, the interpretation of “local need” can and should logically be spread over a much larger area.

The numbers expected within the Local Plan are not for us to challenge as theoretically they are responding to National demands. Our arguments concern distribution. That surely allows more sensitive sites to be protected from over-arching capacity considerations?

We will come back to this point in more detail for the Parish Council presentation in relation to PS05 and PS05a. We will reference the Parish Neighbourhood Development Plan, and forthcoming solutions to deliver its potential. That has been ignored in the LPAs preparation of its emerging Plan and needs to be brought back into proper consideration.

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