



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

Date: 4 December 2017

Our Ref: AG M5/0911-15

Your Ref:

**By email only:**  
[local.plan@stroud.gov.uk](mailto:local.plan@stroud.gov.uk)

Dear Sir/Madam

**RE: LOCAL PLAN REVIEW ISSUES AND OPTIONS CONSULTATION**

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) 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.

**National Context**

It is imperative that the Council takes into account recent changes and proposed changes in legislation and policy.

The Council will be aware of the publication of the Government's Housing White Paper in February of this year. The White Paper proposed a number of planning reforms in order to boost the delivery of both market and affordable housing. We note the inclusion of a number of new tenures within this definition.

The announcement signalled a further softening of the Government's stance on Starter Homes. As a result, they should now be considered alongside the other proposed affordable tenures specified in Box 4 of the Housing White Paper. It is therefore critical that the Borough Council considers the Government's commitments to both diversify the types of affordable housing available and accelerating its delivery when considering affordable housing obligations.

At the beginning of July 2017, Communities Secretary Sajid Javid addressed the Local Government Association (LGA) conference outlining what national and local governments need to do to address the nationwide housing crisis. He stated that *"there's a serious shortage of decent, affordable housing in this country"*.

Mr Javid summarised the issue, by outlining that:

*"the simple fact is that to put this right we need to build more homes that people want to live in, in places people want to live"*.

Since Mr Javid's speech, there has been an increasing amount of rhetoric from Government to boost affordable housing provision but to also maximise the amount of affordable housing being delivered on each individual site.

Most notably, is the ratification of the Mayor of London's affordable housing Supplementary Planning Guidance (SPG) 'Homes for Londoners' which was adopted in August 2017. The document aims to maximise the amount of affordable housing being provided on schemes by introducing a 'threshold approach to viability' and ensuring that developers provide the 'maximum reasonable amount' of affordable housing.

Following the adoption of the 'Homes for Londoners' SPG, we are aware of an increase in the number of planning applications refused at appeal due to an insufficient amount of affordable housing being proposed on site; indicating a strong national and local push for increasing the amount of affordable housing being delivered on **all suitable sites** across the country.

Appeals include a 268 dwelling, mixed use scheme in the City of Westminster refused in September 2017 by Sadiq Khan over '*unacceptable affordable housing provision*'; and a 705 dwelling, brownfield site in the Royal Borough of Kingston upon Thames's refused by Sajid Javid in September 2017 over serious deficiencies in the section 106 "*particularly in relation to the securing of affordable housing*".

In November 2017 the secretary of state for housing, Sajid Javid, gave a speech on the housing market stating that:

*"Without affordable, secure, safe housing we risk creating a rootless generation, drifting from one short-term tenancy to the next, never staying long enough to play a real role in their community."*

He noted that the number of new homes in England had increased by more than 217,000 in the past year, representing the highest level of house building since the recession but also stated that there remains much, much more to be done.

### **Local Context**

Evidence from the National Housing Federation's Home Truths South West report indicates that Stroud is steadily becoming one of the most unaffordable places to live in the South West. Based on 2016 data, the average house price in Stroud was £266,033. When taken against average annual earnings of £29,026, this results in a house price to income ratio of 9.2. Which means that in Stroud the average value of a property is over nine times the average annual income.

As property prices have continued to rise, increasing numbers of people are living in the private rented sector. The rise in numbers renting, coupled with below average salaries has contributed to a rise in the number of working people claiming housing benefit. With the average private rented property costing £722 to rent per month, Stroud's mean monthly private sector rents are some of the highest across the South West.

Home Truths South West reports that there is already a moderate stock of housing association affordable homes already in Stroud, with a provision of 1,885 such properties. It is important to highlight that despite this provision; the borough is already suffering from a lack of affordability: which means that more market and affordable housing needs to be provided in order to alleviate the affordability issue.

### **Key Issues 9 and 10**

Key issues 9 and 10 deal with meeting the Districts identified future housing needs; and working with neighbouring authorities to meet the needs of the housing market area (HMA) as a whole. In September 2017 Sajid Javid gave a speech on the latest stage of the Government's work to fix this country's broken housing market.

In the speech Javid announced a consultation on the government's proposals for calculating local housing need to ensure a nationally 'consistent approach'. The new approach could see Stroud's Objectively Assessed Need (OAN) increase around 42% from 448 dwellings per annum to 635 dwellings per annum as illustrated in figure 1.

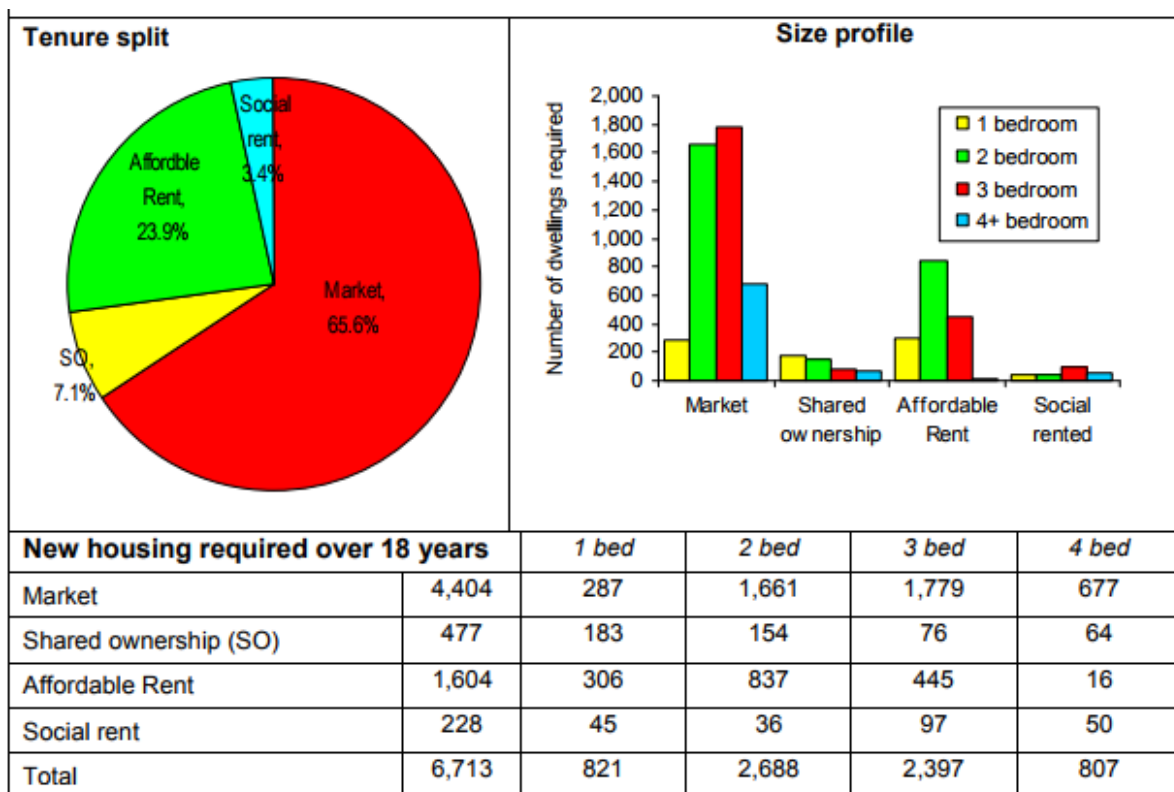
Figure 1: Application of proposed OAN formula in Stroud

Local Planning Authority	Current OAN Figure based on most recent publicly available document (dwellings per annum)	OAN Consultation Figure based on proposed formula, 2016 to 2026 (dwellings per annum)	Percentage Change
Stroud	448	635	+41.74%

Source: Government Housing need consultation data table

Both these figures are already considerably higher than those indicated in the 2013 Local Authorities of Gloucestershire SHMA; which determined the total market requirement to be 4,404 dwellings with the total affordable requirement being 2,309 dwellings, as demonstrated in figure 2. This would equate to an annual requirement of 245 market homes and 128 affordable homes (a total of 373 dwellings per annum).

Figure 2: Profile of new accommodation required in Stroud (main scenario)



Source: Gloucestershire Strategic Housing Market Assessment updated household dataset 2013

The Council's most recently available OAN figure represents a 20% increase on the 2013 SHMA figure. Should the Government be minded to implement the new standard OAN methodology the Council's annual requirement would be 75% higher than that in the 2013 SHMA. This coupled with the fact that the Council has only met the 2013 SHMA affordable housing requirement once in the plan period (2012/13), as illustrated in figure 4, implies a growing affordability crisis in the District.

### Key Issue 11

Key issue 11 is concerned with tackling the acute lack of affordable housing in the District. We note the existing Local Plan in the Stroud was adopted in November 2015 and covers the period 2011 until 2031. DCLG data suggests that since the start of the plan period in 2011 a gross total of 730 affordable dwellings have been completed, as illustrated in Figure 3.

Taking into account the 119 Right to Buy Sales since 2011, Figure 3 highlights that the Council's **net provision** of affordable housing since 2011 has been some 611 homes. This means that every year, the Council has provided an average of around 100 affordable homes.

Figure 3: Net Affordable Housing Provision in Stroud 2011-2017

(A) Year	(B) Affordable Houses Delivered	(C) Right to Buy Sales of Affordable Housing	(D) NET Affordable (B - C = D)
2011/12	50	5	45
2012/13	160	22	138
2013/14	130	25	105
2014/15	130	26	104
2015/16	120	24	96
2016/17	140	17	123
<b>TOTAL</b>	<b>730</b>	<b>119</b>	<b>611</b>

Source: CLG Live Tables 1008C & 685

Figure 4 compares the annualised affordable housing requirement in the 2013 SHMA with net affordable housing delivery in the district over the current plan period. The table indicates that there has been a shortfall of 157 affordable homes to date and the council has only exceeded the requirement once in 6 years.

Figure 4: Net Affordable Shortfall in Stroud 2011-2017

(A) Year	(B) Net Affordable Houses Delivered	(C) Affordable Housing Requirement (2013 SHMA)	(D) Shortfall (B - C = D)
2011/12	45	128	-83
2012/13	138	128	10
2013/14	105	128	-23
2014/15	104	128	-24
2015/16	96	128	-32
2016/17	123	128	-5
<b>TOTAL</b>	<b>611</b>	<b>768</b>	<b>-157</b>

Source: 2013 Local Authorities of Gloucestershire SHMA

Given the acute affordable housing need in Stroud, and the ongoing shortfall in provision, we encourage the Council to set ambitious yet pragmatic targets to increase affordable housing delivery across the district.

We would like to be consulted on further stages of the Plan and other publications by the Council, by email only to [consultation@tetlow-king.co.uk](mailto:consultation@tetlow-king.co.uk). Please ensure that the **South West HARP Planning Consortium** is retained on the planning policy database, with **Tetlow King Planning** listed as their agents.

Yours faithfully

[Redacted signature]

[Redacted line]

**Assistant Planner**  
For and On Behalf Of  
TETLOW KING PLANNING

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