

Oakley Farm, Priors Road, Cheltenham, Gloucestershire, GL52 5AQ, 20/01069/OUT

Level of Affordable Housing Provision:

Based on a scheme of 250 residential units we will be seeking 40% affordable housing in line with JCS Policy SD12: Affordable Housing (100 affordable homes).

The Council will also explore with the developer, Homes England and local Registered Providers regarding the possibility of securing additional affordable housing units on the site.

The Council interprets that latest LHNA that has been commissioned also requires a mix of 70:30 rented to intermediate housing. This mix strikes a balance between fostering cohesive, resilient communities and meeting affordable housing needs.

Dwelling Mix:

Having regard to local needs and a mix of 70:30 rented to intermediate housing, we would seek the following mix of affordable dwellings on a policy compliant site:

	Social Rent	Affordable Rent (capped at LHA)	Shared Ownership	Total	%
100 (40%)					
1b2p GF Maisonette M4(2) Cat 2, 50m2.	8	0	0	8	8%
1b2p UF Maisonette, 50m2.	8	0	0	8	8%
1b2p Bungalow, M4(3) Cat 3b, 60m2.	2	0	0	2	2%
1b2p Bungalow, M4(2) Cat 2, 50m2.	6	0	0	6	6%
2b4p House, 71m2.	0	0	14	14	14%
2b4p House, M4(2) Cat 2, 79m2.	0	12	4	16	16%
2b4p GF Maisonette, M4(2) Cat 2, 71m2.	0	5	0	5	5%
2b4p UP Maisonette, 71m2.	0	5	0	5	5%
3b5p House, 83m2.	0	6	8	14	14%
3b5p House, M4(2) Cat 2, 93m2.	0	6	0	6	6%
3b6p House, 95m2.	0	4	4	8	8%
4b7p House, 108m2	6	0	0	6	6%
5b8p House, 121m2.	2	0	0	2	2%
TOTALS:	32	38	30	100	

Dwelling Mix:

JCS Policy SD11 sets out that development should address the needs of the local area, including older people, as set out in the local housing evidence base (note my emphasis) including the most up to date SHMA (now LHNA).

The Council's preferred dwelling mix is found above and has been informed by a number of evidence bases that are reflective of affordable housing need of the Borough, in addition to discussions with Registered Providers. Evidence supporting the proposed mix found on Page 1 can be provided upon request.

Rents:

The Council's latest evidence base, the 2020 Gloucestershire LHNA indicates that Cheltenham Borough has an overriding need to deliver social rented homes to meet affordable housing need. Figure 86 reflects that, between 2021-41, Cheltenham Borough has a need for 1,511 rented homes, of which 1,325 new affordable homes should be provided in the form of Social Rent, which forms 88% of Cheltenham's rented need.

Supporting the need for social rented homes, The 2015 SHMA Update Note indicates a substantial need for rented affordable housing in Cheltenham Borough with particular emphasis upon social rented delivery. Case and point, of 707 households in need of affordable housing each year in Cheltenham, Table A1.12 states that 76% of Cheltenham Borough Council's total affordable housing delivery (537 Affordable Homes per annum) should be in the form of Social Rent, compared to 15% for Affordable Rent respectively.

The Housing Enabling team will focus upon targeting social rented provision for areas of significant affordability pressure, namely 1 bedroom, 4 bedroom and 5 bedroom homes. The remaining 2 and 3 bedroom affordable homes should be let at LHA capped affordable rented levels. Capping the remaining affordable rented homes at LHA levels will provide reassurances to Local Authorities that housing costs will be covered in full by housing benefit.

CBC has been classified as an area of high affordability pressure by Homes England, thereby recognising the overriding need to deliver social rented homes.

<https://www.gov.uk/government/publications/areas-of-high-affordability-pressure/list-areas-of-high-affordability-pressure>

The recently published [Government Written Ministerial Statement on First Homes](#) explicitly recognises the importance of providing social rent, stating that:

“The Government recognises the importance of social rent as part of the affordable housing tenure mix. A local authority should prioritise securing their policy requirements on social rent, once they have secured the 25% First Homes requirement”.

Service Charges:

Any service charges on the affordable dwellings should be eligible for Housing Benefit.

Service charges should be kept minimal this can be achieved through the design and we would be happy to refer you to RP's for further input if necessary.

Shared Ownership:

We would expect that the shared ownership units will be let at a level that is affordable, having regard to local incomes and house prices. Additionally, Shared Ownership homes should be let in line with the latest Capital Funding Guide (CFG) from Homes England.

First Homes:

In terms of potential First Homes provision, the Council would refer the applicant to [Paragraph 20 of the First Homes PPG](#), found below:

“The new First Homes policy requirement does not apply for the following...

- Sites with full or outline planning permissions already in place or determined (or where a right to appeal against non-determination has arisen) before 28 December 2021
- Applications for full or outline planning permission where there has been significant pre-application engagement which are determined before 28 March 2022”

In the professional view of this officer, this scheme (or at least the Outline scheme) is likely to be determined before 28th March 2022 owing to the immediacy of the forthcoming appeal process due in September 2021. It follows therefore that the First Homes policy requirement is unlikely to apply to this scheme.

Notwithstanding this point, the Council is open to exploring the provision of First Homes on this scheme, and is currently preparing a First Homes interim policy statement to clarify how the Council envisage that the First Homes obligations should be applied in practice.

In the event that all parties agreed to include First Homes on this scheme, the Council would seek a 50% First Homes discount, primarily to ensure that 1-3 bedroom homes were genuinely affordable to first-time buyers with average incomes in the Borough, but beyond this to maximise the accessibility of the First Homes products to first-time buyers with a local connection to the Cheltenham Borough administrative area.

The Council would also be likely to set out local connection criteria, as well as defining ‘key worker’ occupations for the purposes of allocating First Homes within a S.106 agreement. This S.106 agreement (using the Precedent S.106 template) would also include clauses to address First Homes eligibility criteria in addition to securing First Homes discounts in perpetuity. As of writing, the Council has no intention on setting income caps for First Homes.

Car Parking:

Parking provision for affordable homes will be expected to be made on the same basis as that provided for market dwellings.

The Council would prefer on-plot parking wherever possible.

Affordable Housing Standards:

We would expect all the affordable housing to meet minimum gross internal floor area size measurements, space, design and quality standards as described by the Homes England.

Amendments to M4(1), M4(2) and M4(3) of Schedule 1 to the Building Regulations 2010 took effect on 1st October 2015 therefore we would seek the Council's preferred mix found on Page 1.

Provision of Accessible/Adaptable/Wheelchair-accessible affordable homes:

In terms of the policy context supporting the provision of accessible and adaptable affordable homes, JCS Policy SD11: Housing Mix and Standards confirms that:

“JCS Policy SD11 sets out that development should address the needs of the local area, including older people, as set out in the local housing evidence base (note my emphasis) including the most up to date SHMA (now LHNA)”.

Before proceeding to state:

“Housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies”.

Supporting JCS Policy SD11, JCS Policy SD4: Design Requirements states that new development should be ‘fit for purpose’ as well as being both adaptable to accommodate changing life circumstances and accessible to all users help form sustainable communities, enabling all residents to thrive.

The 2020 Gloucestershire LHNA identifies that, between 2021-41, there is a need for 67% of all new development across Gloucestershire to meet M4(2) Cat 2 standards. Looking at Cheltenham's needs specifically, the LHNA notes that Cheltenham Borough has a need to deliver 7,215 M4(2) Category 2 homes between 2021-41 (361 M4(2) Cat 2 dwellings per annum). It therefore follows that the Council will seek to maximise the provision of new M4(2) Category 2 affordable homes on this development scheme where practicable- a position which has been reflected within the dwelling mix table found on Page 1.

Above and beyond the needs outlined above, the 2020 Gloucestershire LHNA, projects a need for Cheltenham Borough to deliver 213 M4(3) Category 3 affordable homes between 2021-2041 (an average of 11 per annum) to meet the identified needs of wheelchair users. Further evidence can be provided upon request concerning the Borough's wheelchair needs.

To accommodate this need, the Council will be seeking to deliver 2 x 1b2p M4(3) Cat 3b wheelchair accessible homes, built to 60m², as reflected within the dwelling mix table.

Design, Clustering and Layout:

The design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials.

Furthermore, affordable housing should also be provided on-site and should be seamlessly integrated and seamlessly distributed throughout the development scheme to the extent that the development is tenure blind, and the affordable homes are visually indistinguishable from their affordable counterparts.

In line with the JCS clustering strategy, the Council will expect that each cluster of Affordable Housing Units shall not exceed eight (8) units unless otherwise agreed in writing by the Council. The JCS

clustering strategy also clarifies the Council's expectation that no group of Affordable Housing Units will be located contiguously to any other group of Affordable Housing Units.

Further guidance on appropriate clustering and/or layout of the affordable homes on this development scheme can be provided by the Housing Strategy and Enabling Officer upon request.

In the absence of a planning layout and affordable housing plan, The Council will await a more detailed planning layout before commenting further upon the distribution and layout of the affordable homes.

Full Planning Application:

On submission of a full planning/revised matters application we would require an Affordable Housing Plan as part of the application, detailing the location of both the market and affordable homes in terms of their type, tenure, accessibility standards and size as well as highlighting parking spaces and the dwellings they serve.

Registered Providers:

All affordable housing should be provided by a Registered Provider who will be expected to enter into a nominations agreement with the Local Authority, providing 100% nominations on first lettings and 75% of all subsequent lettings thereafter. On any Category 2 or 3 dwellings, the Council will seek 100% nominations on all lettings to ensure that these homes are let to households in the greatest priority need. Taking this approach will assist the Council in meeting its statutory housing duties under the Housing and Homelessness legislation.

A list of Registered Providers managing accommodation in Cheltenham can be made available if needed.

Ewan Wright

Housing Strategy and Enabling Officer

21/07/2021