

Affordable Housing Statement

Barrington Close and Fairford Close
KINGSWOOD, SOUTH GLOUCESTERSHIRE

Prepared on behalf of
BROMFORD

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BLACKBOXPLANNING.CO.UK

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1 Introduction

- 1.1 This Affordable Housing Statement has been prepared by Black Box Planning and is submitted to support a full planning application made by Bromford Housing Group (the 'Applicant') to South Gloucestershire Council in respect of residential development at Barrington Close and Fairford Close, Kingswood, South Gloucestershire. This statement forms part of a suite of information comprising the planning submission.
- 1.2 Bromford Housing Group Ltd are a housing association across the Midlands and Southwest, owning and managing over 46,000 homes with relationships with over 110,000 customers. As a housing association, Bromford exist to provide affordable homes for people who are not able to access market housing. They are committed to providing safe, secure and warm homes, investing in homes and communities people can thrive in.
- 1.3 In 2021, Bromford was announced as one of Homes England's Strategic Partners securing £240m grant funding for the delivery of 4,000 new homes up to 2029. Alongside their own capital funding, Bromford's 2023-2027 Strategy targets delivery of 11,000 new homes by 2030.
- 1.4 Specifically in South Gloucestershire, Bromford merged with Merlin Housing Society in July 2018. Previously, Merlin were the stock transfer authority for South Gloucestershire's housing stock. Having taken up this role following the merger, Bromford remain committed to the delivery of high quality housing in the area.

SITE OVERVIEW

- 1.5 The existing site comprises 72no. Easiform non-traditional 2-bedroom flats across 11no. blocks which have reached their end-of-life; 32no. properties at Barrington Close (13 to 44 all numbers inclusive) and 40no. properties at Fairford Close, Kingswood (1 to 13 odd numbers only, 15 to 40 all numbers inclusive and 42 no 54 (even numbers only) and 48no. garages. The proposed development comprises demolition of all the existing homes and garages on site and their replacement with 85no. modern, energy efficient affordable homes of between 1 and 4 bedrooms including both flats and houses with associated parking and landscaping.
- 1.6 Sixty-four of the 72no. existing flats are let as social rented housing and are owned by Bromford. The remaining 8no. flats were historically sold into private ownership under the right to buy. Six of these have since been bought back by Bromford, and the remaining two properties are expected to be bought back by Bromford in due course. As such, there are currently 64no. social rented properties on site, and 8no. market properties.
- 1.7 Bromford are in the process of rehousing their on site customers elsewhere. The regeneration scheme will be split into two phases; the focus is on moving customers from Phase 1 currently.
- 1.8 Bromford's existing eligible customers will have an opportunity to return to replacement homes on site once the relevant phase of the development is complete. After re-housing returning customers, Bromford intend to offer the majority of the remaining homes to South Gloucestershire Council's nominations from the housing register in addition to the S106 requirement.
- 1.9 This application is accompanied by a Social Value Report, prepared by Bromford, setting out their long-term commitments to the local community. Those commitments go well beyond market sale homes and include:

- Community coaches;
- Neighbourhood initiatives;
- Supporting the delivery of apprenticeships locally;
- Local employment and coaching strategies; and
- Embedding sustainability to improve the quality of affordable housing delivery.

2 Policy and Housing Needs Context

- 2.1 The relevant planning policy context for affordable housing is contained within the National Planning Policy Framework (NPPF), the South Gloucestershire Core Strategy (December 2013), and the South Gloucestershire Policies, Sites and Places Plan (November 2017).

NATIONAL PLANNING POLICY FRAMEWORK

Delivering a sufficient supply of homes

- 2.2 NPPF Paragraph 60 states that to support the Governments objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.
- 2.3 NPPF Paragraph 62 confirms that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 2.4 NPPF Paragraph 63 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:
- (a) Off-site provision or an appropriate financial contribution in lieu can be robustly justified;
 - (b) The agreed approach contributes to the objective of creating mixed and balanced communities.
- 2.5 NPPF Paragraph 64 suggests that provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.
- 2.6 NPPF Paragraph 65 requires that where major development involving the provision of housing is proposed, planning policies and decisions should expect that at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:
- (a) Provides solely for Build for Rent homes;
 - (b) Provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
 - (c) Is proposed to be developed by people who wish to build or commission their own homes; or;

- (d) Is exclusively for affordable housing, an entry-level exception site or a rural exception site.

SOUTH GLOUCESTERSHIRE CORE STRATEGY (DECEMBER 2013)

- 2.7 The South Gloucestershire Core Strategy sets out local policy position in relation to affordable housing provision.
- 2.8 Policy CS18 relates to affordable housing, requiring developers to achieve 35% on-site affordable housing on all new housing developments, usually without public subsidy, in urban area of 10 or more dwellings.
- 2.9 Policy CS18 also states that developments should contribute to a range of housing provision in local areas, with the aim of achieving mixed and balanced communities, and refer to the findings of the Strategic Housing Market Assessment, in providing the specific housing mix required to meet housing needs.

POLICIES, SITES AND PLACES PLAN (NOVEMBER 2017)

- 2.10 Policy PSP37 requires that affordable housing be provided consistent with nationally described minimum internal space standards. The policy also requires that affordable units meet accessibility standard M4(2) and that 8% of affordable units meet wheelchair standard M4(3). However, the policy is clear that M4(2) and M4(3) accessibility standards will only be required where step free access can be achieved.

AFFORDABLE HOUSING AND EXTRA CARE HOUSING SPD (APRIL 2021)

- 2.11 The Affordable Housing and Extra Care Housing SPD contains detailed advice and guidance of the implementation of Core Strategy Policies CS18, CS19 and CS20.
- 2.12 Paragraph 3.3 sets out that the gross number of new dwellings created as part of a development scheme will be used to determine the number to which the Affordable Housing threshold and percentage will be applied. Existing dwellings, which might be present on a site and which would subsequently be demolished or the subject of significant structural alterations will not be discounted, except in specific circumstances, such as estate regeneration or in the application of the Vacant Building Credit

DRAFT SOUTH GLOUCESTERSHIRE LOCAL PLAN

- 2.13 In November 2023, Phase 3 of the draft South Gloucestershire Local Plan was approved by Cabinet for Regulation 18 consultation. This provides a '*working policy*' for Affordable Housing provision.
- 2.14 This policy does not yet provide figures for the quantum of affordable housing provision expected within South Gloucestershire, however confirms that the Council is committed to supporting people with the cost of living crisis and to ensure everyone has access to an affordable, decent, safe and sustainable home, setting out that maximising the affordable housing provision in South Gloucestershire is a key priority for the council.

LOCAL AFFORDABLE HOUSING NEEDS

- 2.15 South Gloucestershire has a significant need for affordable housing across the authority area. The affordability of housing in the authority area has substantially worsened over the past decade with average house prices now at over 8 times the average earnings, according to Office for National Statistics (ONS) data¹.
- 2.16 Currently, the HomeChoice register demonstrates that there are 5,120 households currently on the Housing Register in South Gloucestershire. Of these, 605 households have Kingswood as their first-choice area. The HomeChoice register indicates that of those who have indicated Kingswood as their first choice area, 11no. households are on the 'priority' list where an exceptional need is identified, a further 38no. households are on Band A 'high priority', 90no. in Band B and 170 in Band C.
- 2.17 The HomeChoice register currently demonstrates the highest need for 1-bedroom homes in Kingswood (323 households), followed by 2-bed homes (173 households), 3-bed (103 households) 4 and 5+ bed need is at 5 and 1 households respectively.
- 2.18 A further 1,561 applicants have said that Kingswood is somewhere they would consider living. Of these, 5 no. households are 'priority card' holders, and 77no. households in Band A.
- 2.19 The Wider Bristol SHMA (2019) identifies an overall need for 26,900 affordable homes in across the wider Bristol area, which includes Bristol, North Somerset, and South Gloucestershire.
- 2.20 This should be considered against the current delivery rate for affordable housing within the Local Authority Area. The Authority Monitoring Report (2022), states that 562 affordable homes were delivered in the monitoring year 2021/2022, of which 282 were delivered under social rent. There is demonstrably a very substantial under provision versus the level of need in South Gloucestershire.

¹ House prices to workplace-based earnings ratio – March 2021 ONS statistical release

3 Affordable Housing Provision

- 3.1 The proposal will deliver 85no. new homes, comprising a mixture of one to four bed dwellings of a range of house types, all delivered as affordable tenures. This represents a net increase of 21no. affordable dwellings, and an overall net increase of 13no. dwellings in total. All new homes shall be delivered as affordable homes in accordance with the definition set out in the NPPF Annex 2.
- 3.2 The housing mix consists of a mix of 1-bed, 2-bed, 3-bed and 4-four bed homes. The accommodation schedule is shown below in Table 1.

Table 1: Proposed Housing Mix

Unit Type	Proposed Total
1B2P Flat	16
1B2P FOG	1
2B4P Flat/Maisonette	7
2B4P House (narrow)	5
2B4P House (split level stepping down)	16
2B4P House (split level stepping up)	20
3B5P House (wide)	4
3B5P House (part single aspect)	6
3B5P House (split-level stepping down)	3
3B5P House (split-level stepping up)	4
4B6P House	3
	85

- 3.3 All proposed dwellings meet or exceed NDSS standards. These national standards are as follows:

Housetype	Nationally Described Space Standard
1 bed 2 person – 1 storey	50sqm
2 bed 4 person – 2 storey	79sqm
3 bed 5 person – 2 storey	93sqm
4 bed 6 person– 2 storey	106sqm

- 3.4 The majority of the proposed dwellings are to be provided under social rented tenure, which is a tenure for which there is a particularly acute need in South Gloucestershire.
- 3.5 It is proposed that 7no. dwellings will be secured in perpetuity via Section 106, i.e. 35% of the net gain of 21 affordable units, as per Policy CS18. This reflects the Council’s own guidance set out very clearly at section 3.3 of the Affordable Housing and Extra Care Housing SPD, which states that:

*“The gross number of new dwellings created as part of a development scheme will be used to determine the number to which the Affordable Housing threshold and percentage will be applied. Existing dwellings, which might be present on a site and which would subsequently be demolished or the subject of significant structural alterations will not be discounted, **except in very specific circumstances, such as estate regeneration**” (emphasis added).*

- 3.6 From this guidance, it is clear that the existing dwellings on site which are to subsequently be demolished and replaced should be discounted from the number of dwellings to which the Affordable Housing Threshold and percentage should be applied, on the basis that the proposed scheme is one of estate regeneration. This is the only reasonable interpretation of the Council's guidance in the circumstances of the proposed scheme.
- 3.7 The proposed development does not propose provision of M4(3) dwellings given the topography of the site, in accordance with Policy PSP37. This was confirmed as acceptable by the Housing Enabling officer during the pre-app who confirmed that the location and constraints of the topography were noted and would disengage the requirement for M4(3) compliant dwellings.

4 Conclusions

- 4.1 This Affordable Housing Statement has been prepared by Black Box Planning and is submitted in support of a full planning application made by Bromford (the 'Applicant') to South Gloucestershire Council in respect of residential development at Barrington Close and Fairford Close, Kingswood. This statement forms part of a suite of information comprising the planning application submission.

APPORTIONMENT OF WEIGHT TO AFFORDABLE HOUSING PROVISION

- 4.2 The Government attaches great weight to meeting affordable housing needs. Meeting the needs of groups with specific housing requirements is central to national housing policy (NPPF, paragraph 60).
- 4.3 The importance of the provision of affordable housing as a material consideration in the determination of planning applications is a matter considered by the Secretary of State on numerous occasions. Accordingly, the weight afforded in the planning balance should be applied accordingly as a benefit set against any harm.
- 4.4 It is evident that the benefits of affordable housing delivery have both a quantitative and qualitative component. Noting the evidence set out in this Statement, it is clear that the benefits derived through the Proposed Development both in terms of improvements to the quality and energy efficiency of affordable housing provision and the increase in bed-spaces, should be given **substantial weight** in the planning balance.
- 4.5 The consideration of this beneficial weight against other factors is considered in the accompanying Planning Statement.

SUMMARY OF AFFORDABLE HOUSING PROVISION

- 4.6 The proposal comprises the delivery of 85no. dwellings within South Gloucestershire, a net gain of 21no. affordable dwellings, and a total net gain overall of 13no. dwellings. Local Planning Policy requires the provision of 35% affordable housing on sites which a planning obligation will secure as a minimum for the site, this is in accordance with the Affordable Housing SPD which sets out that the gross number of new dwellings created as part of a development scheme will be used to determine the number to which Affordable Housing threshold and percentage will be applied. As a registered provider, Bromford intends to deliver an above-policy scheme of 100% affordable housing, of which 35% of the net gain in affordable units (i.e. 21no. units) will be secured by a Section 106 agreement.
- 4.7 The proposal responds specifically and directly to substantial housing needs identified on the local housing register and is in consideration of the overwhelming demand for affordable housing properties, particularly social rented units.
- 4.8 The 85no. homes will be managed by Bromford (the Registered Provider 'RP') upon completion into the future. Bromford assembled a design team to prepare the planning application and is currently in the process of rehousing their customers elsewhere.
- 4.9 In summary, the affordable housing element of the proposal is considered to represent a suitable and appropriate proposal for meeting the needs of specific groups within the community.