

Responses to Representations made on the Pre-submission Draft Stratford Neighbourhood Development Plan

Policy H6

Representations: Total received 35

Number in Support: 17

Modification Proposed:

The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it is consistent with the Core Strategy and the NPPF.

Individual Representations and Steering Group Responses

Code Number	Full Name	Organisation represented (where applicable)	Policy H6	Neighbourhood Plan Steering Group Response
-------------	-----------	--	-----------	--

Statutory Consultees' Comments

1001	Stratford District Council	Statutory Consultee	Objection is raised to the revised affordable housing mix in the Neighbourhood Plan on pure policy terms. It is substantially different to the mix in the Core Strategy and if every NP was to go down this route the Council would be unable to deliver the mix in the Core Strategy and meet identified District wide needs. This is important because Stratford town is supposed to be meeting a District wide need.	We need to find a mechanism to capture the local need as well as the district wide need. Discussion has been held with SDC taking account of the HNS conducted for the Town Council and the Policy revised to ensure it remains in accordance with the Core Strategy.
------	----------------------------	---------------------	---	---

			<p>Firstly, this policy identifies what it purports to be three specific departures from Core Strategy Policy CS.17:</p> <p>Summary: 1st bullet point states “The requirement for and provision of affordable housing within the Neighbourhood Area will continue to be monitored throughout the Plan period in order to ensure that the most up-to-date evidence is used to identify the current need. Such evidence will be used to inform the provision of affordable housing on qualifying sites.”</p> <p>Observations: On a procedural point, Policy CS.17 does not explicitly deal with its own review so this criterion doesn’t really create any real “added value” for the Plan. More substantively, this situation is really no different from anywhere else within the District. But it is important to note that any evidence would need to relate specifically to this Neighbourhood Area, as opposed to the District as a whole, to be of any real utility.</p> <p>Summary: 2nd bullet point and Table 1 identify an affordable housing mix different to that in the Core Strategy (implicitly, the table in Part B of Policy CS.18).</p> <p>Observations: The proposed affordable housing mix in Table 1 differs significantly from that set out in Core Strategy CS.18. It would appear that the mix in question may derive from Table 8.15 of the January 2013 SHMA. This is a demographic projection for the period 2008-2028, and so not directly comparable with the assumptions underpinning the</p>	<p>This should stay. STC will be undertaking its own housing needs survey (HNS) to identify local housing needs which should be addressed alongside the district wide need.</p> <p>This will be superseded by the HNS which will be commissioned by STC.</p> <p>The 2012 Housing Needs Assessment highlights the following need across the Neighbourhood Area:</p>
--	--	--	---	--

			<p>proposed Core Strategy provision for the Neighbourhood Area.</p> <p>Attention is drawn to the importance of catering for working age single person and childless couple households to ensure the long-term sustainability of the communities within the Neighbourhood Area. These are the households who most struggle to find any accommodation that is affordable in the area – not least because they are generally not regarded as high a priority for affordable housing as households with children and older person households.</p>	<p>13 x 2 bedroom houses for affordable rent 1 x 2 bedroom bungalow for affordable rent 6 x 3 bedroom houses for affordable rent 1 x 4 bedroom house for affordable rent</p> <p>3 x 2 bedroom houses for shared ownership</p> <p>Development will be expected to meet any unmet local need and thereafter provide affordable housing broadly in accordance with the following tenure split:</p> <p>80% Affordable Rent 20% Shared Ownership”</p> <p>It is welcome that SDC recognises this issue.</p>
--	--	--	---	---

			<p>Nevertheless, whilst the Plan correctly acknowledges the problems faced by single person and childless couples, the proposed solution is considered unworkable and will probably lead to fewer affordable homes being developed.</p> <p>It is highly unlikely that any housing association will agree to develop as many as 43% one bedroom properties. Such a high proportion of units is regarded as unsustainable – not least because many of the households in these units will go on to form larger households but will find it difficult to move to either alternative housing association or other accommodation that is affordable because demand for such homes is high. In addition, in order to minimise potential management issues arising from concentration of similar households in one location, housing associations generally prefer to develop a range of property sizes and types on any one site.</p> <p>It would be useful to discuss this issue with the Town Council in more detail to better understand what primary research is available at a local level to drive the preferred stock mix.</p> <p>It is unclear whether the optimum mix is intended to apply as an average across the Neighbourhood Area (in which case robust monitoring arrangements would be essential) or, alternatively,</p>	<p>Agreed – and a compromise will be found.</p> <p>Historically SDC has always resisted 1 bedroom properties because they are inflexible and lead to a high turnover of occupancy. However this a little short sighted because there is a demographic that simply cannot afford to buy a two bedroom property... It is acknowledged that the figures may be too high and will be revised to remain consistent with the Core Strategy.</p> <p>Agreed</p> <p>It was intended to be applicable to individual schemes – that's the best way of managing it.</p>
--	--	--	---	---

			<p>in relation to individual schemes (in which case it would probably be so unduly prescriptive as to be unworkable).</p> <p>Summary: 3rd bullet point is a measure to prevent the avoidance of affordable housing provision. Observations: On a point of fact, Policy CS.17 does not explicitly deal with this topic. This is a District-wide issue and it is expected it will be addressed in the forthcoming Development Requirements SPD.</p> <p>Secondly, the Policy raises certain additional issues:</p> <p>The Policy states “This Plan supports the completion of an up to date Housing Needs Survey for the Neighbourhood Area”. The commitment to undertake such a survey is most welcome. However, further consideration needs to be given to the delivery of this project – possibly outside the scope of the Plan itself.</p> <p>The explanatory text (p.24) includes a number of criteria which are in effect policy requirements. Briefly, these require: Tenure blind development. Affordable homes in clusters of no more than 12 units. Tenure mix to be well integrated into layout. For smaller scale developments (less than 10 units) “the tenure mix should support “the existing pattern of tenures or introducing new tenures as appropriate”. Management of communal areas must be</p>	<p>No reason can be seen why it cannot be included in the NDP. It does not conflict with the CS or the NPPF...</p> <p>The HNS will be commissioned by STC outside of the NDP but in parallel with it.</p> <p>Agreed</p>
--	--	--	---	---

			<p>adequately addressed. These issues are of District-wide significance, and it is expected that they will be addressed within the proposed Development Requirements SPD. If the Town Council nevertheless wish for these issues to be addressed within the Plan, it is recommended they are incorporated within a specific Policy.</p> <p>With respect of the 4th bullet point, this point isn't really understood. The relevant Core Strategy thresholds would militate against on-site provision and this Plan itself isn't proposing any alternative, lower, thresholds. Finally, it is observed that, with the exception of the Canal Regeneration Zone and two sites at Tiddington, there are no other identified sites against which the implications of the proposed stock mix in Table 1 can be specifically assessed.</p> <p>The threshold of including adjacent land is difficult to work and doesn't this pre-judge whether planning permission would be granted for adjacent land?</p> <p>Delivery of 42% 1 bed units will be likely to be via apartments – is this the required outcome?</p> <p>Concern is raised that the last bullet point referring</p>	<p>This will be deleted or re-worded</p> <p>This is designed to prevent a site coming forward next to any existing commitment where both could be expected to be part of a wider site which has been subdivided to prevent AH contributions. This is standard policy.</p> <p>Potentially. However, the mix will be changed as previously mentioned.</p> <p>Disagree. This is not unlawful.</p>
--	--	--	---	--

			<p>to taking account of adjacent land to meet certain thresholds is not lawful.</p> <p>The explanation section should refer to latest evidence base, rather than include a table that becomes out of date quickly.</p>	Agreed.
--	--	--	--	---------

Agents and Developers' Comments				
507	JLL re: Gateway One	Developer's Agent	<p>This policy states that: <i>'proposals which do not contribute appropriate levels and type of affordable housing will not be supported'</i>.</p> <p>Further flexibility should be built into this policy to ensure that levels of affordable housing can be reduced where sites are not viable. This approach is in line with the NPPF Paragraph 173 to 174. The policy should recognise that in some cases affordable housing requirements may need to be reduced in order to generate a viable scheme. At present, this policy could render some sites unviable and hence restrict housing delivery, contrary to the NPPF.</p>	This particular quoted provision will be deleted. It is felt that the Core Strategy will provide the flexibility to consider viability.
508	Pegasus Group re: Gallagher Estates	Policy H6, H7, H8 & H9	<ul style="list-style-type: none"> • These policies are unnecessary and overly prescriptive and should be deleted • As currently drafted, none of these policies are consistent with the CS 	<ul style="list-style-type: none"> • These policies are necessary and correctly prescriptive • These policies will be redrafted to take account of the latest position in the CS. The CS sets out a range of mixes. The NDP using up to date Housing Needs Survey results is entitled to be more

				prescriptive than the CS
512	RPS re Taylor Wimpey and Miller Homes		<p>Policies H6/H7 – Affordable and Market Housing Mix</p> <p>Both of these policies propose a housing mix different to that in the emerging Core Strategy, drawing from the January 2013 Strategic Housing Market Assessment (SHMA).</p> <p>Evidence used in the generation of policies should be both robust and up to date. Whilst the SHMA is a credible evidence source, the document referred to pre-dates the most up to date SHMA, published in November 2013. It is this document that the Core Strategy has used as part of emerging policy CS.18, as per the proposed modifications. The emerging policy in the Core Strategy includes a more flexible range (as indicated below) than proposed as part of policies H6 and H7 and the Plan should consider the needs to produce a flexible, responsive document.</p> <p>Core Strategy Mix for new Policy CS18</p> <p>Dwelling type Market Housing Affordable Housing</p> <p>1 bed (2 person) 5-10% 10-20%</p> <p>2 bed (3 or 4 person) 35-40% 25-45%</p> <p>3 bed (5 or 6 person) 40-45% 25-45%</p> <p>4+ bed (6, 7 or 8+ person) 15-20% 5-25%</p> <p>As currently drafted, this NDP policy is not consistent with the emerging Core Strategy and it is recommended that this is removed from the Plan and a simple cross reference is made to the Core</p>	<p>The Stratford Housing Needs Survey 2015 provides a robust and the most up-to-date evidence on this issue.</p> <p>Further discussions with SDC will be undertaken on this issue after which the policy may change.</p>

			Strategy.	
516	Framptons re ROSCONN Group		Policy H6 is inconsistent with national planning policy in its reference to affordable housing requirements on developments of less than 10 dwellings. No special justification and evidence base is included in the Neighbourhood Plan to justify a more restrictive approach to the provision of affordable housing.	The national policy contained within the PPG has been withdrawn by the Government following a successful high court challenge.
519	Daniel O'Donnell		The policy is not in accordance with national guidance limiting S106 contribution for developments under 10 dwellings.	See comments to Rep 516 above.
520	Charles Vickery		This policy does not accord with national guidance limiting S106 contribution for developments under 10 dwellings.	See comments to Rep 516 above.

Residents' Comments				
013	Rosanna Dymoke-Grainger		Overall when compared to Leamington and Warwick Stratford is on par with these housing markets. If anything Stratford is slightly slower and cheaper. Therefore affordable housing should be considered but it shouldn't be pushed too far.	The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it is consistent with the Core Strategy and the NPPF.
018	Stephen Wreford		I support this policy	Supportive
025	Jane Dodge		Affordable housing should only be for people who actually work in Stratford and should be supported by a Housing Need Survey to ensure there is a need and that it is in a sustainable location. We should not	Supportive HNS being undertaken. The policy will be reviewed in the light of the HNS and in discussion

			be providing affordable housing for people who live in other major conurbations.	with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
038	Amanda Waters		No view	-
049	Gillian M. Hayward		Affordable housing, this needs to be restricted to shared ownership schemes rather than rentals. At present so much is rented which seems to defeat the purpose which is as I understand it to enable folks to get onto the property ladder, but wealthy landlords are snapping these cheaper properties up first.	The policy for affordable homes is stated in the Core Strategy Supportive The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
053	Geoffrey Prince	Several local residents	We support this policy. However, for it to be relevant other policies need to enable this policy to be implemented across all settlements in the NDP area including at Alveston. As noted above Policies H1, H2 and H3 as currently written will impose severe constraints to the delivery of local needs housing in Alveston.	Supportive - but response to remainder of comment given under Pols H1-H3.
056	Martyn Luscombe	Stratford Voice	Continuous monitoring of provision and need is essential	Supportive The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
057	Trevor Honychurch		Agree but the definition of "affordable" needs to be looked at- the reason why so many younger families do not live here is simply the excessive price of housing.	Supportive The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.

063	Tony Goddard		For the future of the town it is critically important that developers are required to build specific proportions of affordable housing.	Supportive
070	Matt Sharpe		Regarding affordable housing I am left wondering whether such housing will ultimately serve its purpose of being affordable for young people, or simply be snapped up by buy-to-let landlords.	The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
074	Roger & Lesley Read		Agree	Supportive
086	Jenny Fradgley		Important to maintain 35% by floor space. When conditions allow affordable housing to be constructed off development site this needs to happen within a reasonable time span	The policy for affordable homes is stated in the Core Strategy. This is 35% by numbers of dwellings Supportive The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
095	Eric Ward		Strongly agree	Supportive
139	Renny Wodynska		I am totally opposed to the building of rented affordable housing which will be pepper potted amongst owner occupiers. I say this as someone who works in the housing sector, with people who rent. The no of problems and issues from people who are renting, anti-social behaviour for example, makes me feel that in today's society this no longer works. Having lived myself until last year by council housing and then by tenants of Orbit Housing I am totally against being in the vicinity due to the no of problems caused by a few anti-social tenants.	The policy for affordable homes is stated in the Core Strategy Opposed The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.

140	Alan George		I am totally opposed to the building of rented affordable housing alongside that for owner occupiers. Due to people's changing natures and an increase in anti-social behaviour I am against this.	Opposed The policy for affordable homes is stated in the Core Strategy The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it is consistent with the Core Strategy and the NPPF.
143	Chris Strangwood		This should be a priority for all arears and not necessarily the town	Supportive
174	Sarah Eglin		strongly agree	Supportive
182	David White		Vital to keep our children in the town. There is too much four and five-bedroom developments which encourage wealthy outsiders when we should be helping our own youngsters.	Supportive
201	Graham John Nicholson	The Inland Waterways Assoc. (Warks branch)	Happy to support more affordable housing	Supportive
202	Mr Mark Rowlands		I disagree with this policy. There is no justification to have such a policy to change the profile of Stratford residents.	Opposed The policy for affordable homes is stated in the Core Strategy The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it is consistent with the Core Strategy and the NPPF.
210	Rachel Syson		Agree	Supportive
211	Alex Quinn		The policy should lay out some guidelines on the	Section 8 – Built Environment and

			quality of new homes, not just the mix. Standards should be applied to the number of parking spaces, the sizes of gardens, the width of the roads and the supporting services that must be included for developments of differing sizes. Generic, cheap, red brick boxes are an eyesore and serve nobody in the long run.	Design prescribes standards for house building . Some standards may be outside the remit of a NP.
221	Lindsey Quinn		The quality of housing, roads, parking and other provisions should take equal precedence as the types. The council should set standards as to how much garden and how many parking spaces are provided, as well as the width of roads.	Section 8 – Built Environment and Design prescribes standards for house building . Some standards may be outside the remit of a NP.
253	Daniel O'Donnell		The policy is not in accordance with national guidance limiting S106 contribution for developments under 10 dwellings.	Opposed The policy for affordable homes is stated in the Core Strategy The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
256	Valerie Ansfield		Affordable Housing should be prioritised in areas where car ownership is not a requirement to get access to shopping and other facilities i.e. towards the Town Centre. Brownfield sites offer an ideal opportunity for concentration of these.	Supportive The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it it is consistent with the Core Strategy and the NPPF.
257	Bennet Carr, Headmaster	King Edward VI School	Affordable Housing. The requirement for and provision of affordable housing especially for keyworkers such as state school teachers.	Supportive
278	Joan Graham		Affordable housing, particularly for growing families who work in the area is badly needed. (1,2 and 3 bed).	Supportive

282	Anne Marian Kiely		<p>IMPORTANT to use criteria under Policy SSB4 / SSB5 for Social Housing to be used for whole of BUAB proposed new boundaries. Recent events in Grove Road / Arden Street / Birmingham Road emphasise the importance of EXCLUDING undesirable people from Neighbourhood.</p>	<p>The policy for affordable homes is stated in the Core Strategy The policy will be reviewed in the light of the HNS and in discussion with SDC to ensure it is consistent with the Core Strategy and the NPPF.</p>
-----	-------------------	--	--	--