



Affordable Housing Standing Advice Note



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| 2.1 | Nov 2025 | Typos corrected. New Section 1.4. Amendments to Chapters 2, 6, 8, 9, 10, 14 & 17. New Section 10.7. Section 16.5 deleted. Additional footnote to Chapter 18. |

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Chapter One

1. Introduction and Purposes

1.1 Preface

- 1.1.1 This Standing Advice Note (SAN) has been prepared on behalf of the District Council acting in its capacity as strategic housing authority. This means, in the context of the ***Sustainable Homes, Sustainable Communities*** Stratford-on-Avon District Housing Strategy 2021-2026 (“the Housing Strategy”) or any successor, the provision of new affordable housing and other strategic housing objectives.

1.2 Purposes

- 1.2.1 The main purposes of this SAN are to:
1. Provide advice to applicants and prospective applicants (and their advisers) on requirements for, and good practice in connection with, the provision of affordable housing and related matters.
 2. Assist local communities and members of the public in understanding the role of and requirements for affordable housing as part of development schemes.
 3. Signpost all parties to the availability of additional information and resources.

1.3 Background

- 1.3.1 The context for the policies and initiatives referenced in this SAN is their attempt to address the long-term and ongoing shortage of affordable housing within the District. Further information on this matter may be found in, for example, the Housing Strategy ***Evidence Log***. This shortage has serious implications for individuals, households and local communities. Indeed, it also has much wider social, economic and environmental implications.
- 1.3.2 The policies and initiatives referenced in this SAN are also intended to address and support:
1. National aspirations and guidance concerning housing delivery.
 2. Corporate objectives, especially those set out in the ***Council Plan*** and ***Housing Strategy***.
 3. The creation/maintenance of sustainable communities, both new and existing.

1.4 Boosting Housing Supply

- 1.4.1 In the above context, there has also been a material change in circumstances since this SAN was originally approved and published. On 6 October 2025, the Council’s

Cabinet considered a **report** and associated recommendations¹ to establish an action plan to boost housing land supply. It was acknowledged that this Authority is currently unable to demonstrate a five-year supply of deliverable housing sites (when measured against national targets) in accordance with national policy. In summary, this Authority has decided to take a proactive approach in order to re-establish the required supply.

- 1.4.2 One consequence of the above lack of a demonstrable five-year supply of housing sites is that planning decisions should apply a 'presumption in favour of sustainable development'. This presumption is not automatic and does not over-ride the statutory supremacy of the development plan. But it does in practice mean that proposals for residential development are more likely to be granted permission unless there are strong grounds not to do so. Existing policies concerning affordable housing continue to apply.
- 1.4.3 As a consequence, there are expected to be further opportunities to secure the delivery of additional affordable homes. It is hoped that this SAN (in the context of a wider package of measures) will assist in expediting the delivery of such opportunities.
- 1.4.4 Equally, it remains important to ensure, through the correct application of existing planning policy mechanisms, that the right type, size and tenure of new homes are provided – not simply an increase in numerical quantity – if the issues outlined in Section 1.3 above are to be effectively addressed.

1.5 References

- 1.5.1 References to policies and proposals are to those in the **Stratford-on-Avon District Core Strategy** and the **Development Requirements Supplementary Planning Document** unless stated otherwise: see **Chapter 8** for further information.

¹ See Minute 254.

Chapter Two

2. Status and Scope

- 2.1 This SAN was originally approved by the District Council as an information source for use by stakeholders and partners involved in the delivery of affordable housing on 1 September 2025, with authority delegated to officers to make subsequent updates.²
- 2.2 It does not (indeed cannot) establish or change policy. It identifies existing policy, its background, how it will be applied and identifies good practice. It also brings together in a single location general advice from the Council's Housing Policy and Development Team (HPDT) for ease of reference.
- 2.3 This SAN is published on the District Council's website (www.stratford.gov.uk) for viewing or download, together with the policy documents cross-referenced here and where a wealth of additional information may also be found.
- 2.4 All documentation referenced is subject to periodic change and updating without notice.
- 2.5 Unless otherwise stated, this SAN applies to the whole of Stratford-on-Avon District.

² See Minute 190 of The Cabinet of 1 September 2025.

Chapter Three

3. Planning Consultations and Scope of Responses

3.1 When the Housing Policy and Development Team will be consulted

3.1.1 **General principles.** The Council's development management (DM) officers will continue to formally consult the Housing Policy and Development Team (HPDT) especially on proposals falling in any of the categories listed below.

3.1.2 Pre-application enquiries

- All proposals for or involving 10 or more dwellings.
- All proposals for or involving Specialised Housing.

3.1.3 Outline applications

- All proposals for or involving 10 or more dwellings, or a residential site area of 0.5ha.
- All proposals for or involving Specialised Housing.

3.1.4 Full applications

- All proposals for or involving 10 or more dwellings.
- All proposals for or involving Specialised Housing.

3.1.5 Reserved matters applications

- All proposals pursuant to outline permissions to which an obligation to provide affordable housing is attached.

3.1.6 Approval of details etc.

- Draft planning obligations.
- Requests for approval of required Affordable Housing Specifications.
- Requests for variation of an existing planning obligation if it relates to any affordable or local market housing.
- Discharge of conditions relating to housing stock mix.

3.1.7 Rural/community-led housing schemes

- All self-described proposals, irrespective of scale.

3.1.8 Appeals

- All appeals in respect of schemes that gave rise to a consultation listed under any of the above categories.

3.1.9 Other discretionary consultations

- At the discretion of the case officer, where (for example) proposals give rise to novel policy issues and/or which may have implications for affordable housing delivery.

3.2 Scope of consultation responses

3.2.1 The scope of formal consultation responses will be as set out at paragraph 1.1.1 above. Promoters and applicants will therefore need to seek separate advice on other matters falling within the scope of their proposals (e.g. flood risk, landscape, transport etc.) in accordance with established arrangements.

3.2.2 HPDT does not currently offer ‘paid for’ advisory or consultancy services directly to promoters or applicants but does endeavour to brief Registered Providers (RPs) on significant changes in policy or practice where appropriate.

3.3 Consultation with Warwickshire County Council in its capacity as Adult Social Care Authority

Background

3.3.1 The Care Act 2014 (“the 2014 Act”) established various duties and powers for **Warwickshire County Council** in its capacity as adult social care authority. Amongst other things, these include the promotion of the “well-being” of individuals across a range of criteria. These include in relation to the “suitability of living accommodation”.

3.3.2 The 2014 Act also created a general duty of co-operation between the County Council and a ‘relevant partner’ – in this case the District Council – when carrying out their functions relating to adults with needs for care and support, and carers.

Planning consultations

3.3.3 Applicants may expect the District Council to formally consult the County Council in addition to HPDT (see **Section 3.1** above) in the case of proposals for, or that could include, **Extra Care** and **Specialised Supported Housing** schemes. This includes both affordable and market housing schemes. Further information is also included in **Chapter 17** below.

Terminology

3.3.4 Because the terminology used can sometimes be confusing, a brief explanation of the main housing models involved is provided below.

Extra Care Housing

3.3.5 Extra Care housing is defined in the Glossary to the **Core Strategy**. Briefly, such developments provide **self-contained homes** with design features and on-site care

and support services to enable independent living. It is intended mainly (but not exclusively) for older people. Accommodation will invariably be new-build, although the exact range of facilities and services provided will vary from scheme to scheme.

- 3.3.6 However, there are a range of models of accommodation aimed at older people. Consequently, differences in terminology can sometimes be confusing: for example, ‘retirement’ or ‘independent living’ housing: not all of which will necessarily qualify as ‘Extra Care Housing’. Consultations can expect to be raised on all analogous proposals.

Specialised Supported Housing

- 3.3.7 Specialised supported housing (SSH) schemes are typically defined as housing services where housing support and/or care services are provided to people with disabilities, vulnerabilities or other specialised needs. Normally, the aim of schemes will be to help people live as independently as possible or prepare them to do so. They generally serve all age groups. Accommodation can typically either be new-build or formed by re-purposing existing dwellings.
- 3.3.8 This term covers a very wide range of housing models. Consultations can expect to be raised on proposals likely to fall within the definition of ‘Specialised Accommodation’ in the Glossary to the Core Strategy.

Chapter Four

4. The Role of Registered Providers and Others

4.1 Introduction

4.1.1 Before assessing development proposals against relevant planning policy requirements, it is useful to understand in general terms the roles of key players in the provision of affordable housing and the broad categories of business models under which schemes are delivered.

4.2 Registered Providers

4.2.1 Registered Providers (RPs) will normally have a critical role to play in the delivery of affordable housing. The only exception to this is in relation to Fixed Equity Sale schemes, although this is not in any case a preferred tenure product.

4.2.2 The term 'Registered Provider' is used here to denote both private registered providers (such as not-for-profit housing associations, co-operatives, and for-profit organisations) and local authorities (the District Council also has RP status) that are registered under the relevant legislation³ as social housing providers.

4.2.3 Irrespective of the housing delivery model used (see [Section 4.5](#) below) RPs will assume ultimate responsibility for the funding and delivery of schemes and the future ownership, management and maintenance of the homes thus provided.

4.2.4 RPs are subject to regulatory oversight as outlined in [Sections 4.3](#) and [4.4](#) below. This has important planning benefits.

4.2.5 RPs can act as developers of mixed-tenure market-led housing schemes in their own right: see [Section 4.5](#) below. This has many advantages.

4.2.6 Further information about key factors currently influencing RPs investment decisions is also provided in [Chapter 14](#) below.

4.3 Regulator of Social Housing

4.3.1 The [Regulator of Social Housing](#) (RSH) is the regulatory body for RPs in England.

4.3.2 Its stated objectives include undertaking:

"... regulation of providers of social housing registered with us, including governance, financial viability and value for money that maintains lender confidence and protects the taxpayer. We also focus on neighbourhood, safety, transparency, influence, accountability and tenancy standards, and may take

³ See Housing and Regeneration Act 2008 (as amended).

action if these standards are breached and there is a significant risk to tenants or potential tenants.”

4.3.3 The RSH consumer objectives include:

“to support the provision of social housing that is well-managed, safe, energy efficient and of appropriate quality

to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection

to ensure that tenants of social housing have the opportunity to be involved in its management and hold their landlords to account

to ensure that registered providers act in a transparent manner in relation to their tenants of social housing, and

to encourage RPs to contribute to the environmental, social and economic well-being of the areas in which the housing is situated.”

4.4 Regulatory standards

4.4.1 The RSH sets **regulatory standards** using their statutory powers. They define the outcomes that landlords must deliver, and insofar as relevant to housing delivery are currently set out in a Rent Standard, Transparency, Influence and Accountability Standard, Neighbourhood and Community Standard, Safety and Quality Standard and Tenancy Standard, together with associated Codes of Practice.

4.4.2 Although the details of the above standards are not directly relevant for the purposes of this SAN, the salient point is compliance therewith is in turn central to satisfying the requirements of Parts C and E of Policy CS.18 and associated DMC (10). Thus, the involvement of RPs in the delivery and ongoing ownership and management of affordable housing is the mechanism by which compliance with those standards is assured.

4.4.3 Were an RP not to be involved in delivery, then equivalent arrangements would need to be put in place, which would be difficult and time-consuming. Hence the importance of ensuring (through the mechanism of planning obligations) that RPs are responsible for the delivery and future management of affordable housing for which planning permission is granted and are subject to the regulatory oversight of the RSH. This issue is explored further in **Chapter 14** below.

4.5 Summary of affordable housing delivery models

4.5.1 There are a variety of business models utilised to deliver affordable housing schemes. Again, the detail is not directly relevant for the purposes of this SAN. However, it is useful to summarise their key features.

1. Market-led ('S106') schemes

- 4.5.2 Mixed-tenure housing schemes are developed by private-sector house-builders with a view to the onward sale of the required affordable housing to an RP (on the largest sites there could potentially be more than one RP involved).
- 4.5.3 There is scope to cross-subsidise the delivery of the required affordable housing from profits from the sale of open-market housing.
- 4.5.4 For reasons discussed further in [Chapter 14](#), it is increasingly important to consider the willingness of RPs to partner the delivery of stock provided in this way. This means particular attention must be paid to design, layout and specification. Such schemes, historically, account for the majority of affordable homes developed for RPs within our District.

2. 'Land-led' schemes

- 4.5.5 This model involves an RP assuming the role of acquiring land with a view to undertaking its subsequent development. This offers several distinct advantages to RPs, although it also involves assuming the associated commercial risks. Advantages include greater control of the timing of delivery, build quality and the ability to recycle profits from the delivery of successful schemes to fund future development. Several examples of schemes successfully delivered in the way may be found across the District.
- 4.5.6 Such schemes will need to be assessed against the same planning policy criteria as market-led schemes. They can also include 100% affordable housing schemes.

3. Community-led development

- 4.5.7 Essentially this model involves development instigated by the host local community (normally represented by the relevant parish or town council) in response to an identified local need (see [Chapter 16](#) below). Again, many examples of schemes successfully delivered in this way may be found across the District. Further guidance is also provided in [Chapter 15](#).
- 4.5.8 At a national level 'community-led development' is defined in Annex 2: Glossary to the [NPPF](#). To expedite delivery, and in practice, most schemes have been developed by a housing association who meets this definition and who specialise in developing rural housing schemes at the invitation of the local communities concerned. This is distinct from the option of creating a special-purpose vehicle for development within a specific town or village. This latter option remains open, should a local community prefer, but the challenges involved are discussed in more detail in [Chapter 15](#).

4.6 Care Quality Commission

- 4.6.1 The [Care Quality Commission](#) (CQC) is the independent regulator of health and social care in England. ***It has no direct role to play in the regulation of new residential development. Consequently, CQC will not normally need to be consulted on planning applications.***

- 4.6.2 However, where personal care is to be provided as part of a housing scheme or accommodation-based services, providers will wish to satisfy themselves that the design and specification of such schemes will enable the scheme operator to satisfy relevant regulatory requirements.
- 4.6.3 In addition, in the case of Extra Care Housing schemes it will be necessary to include clauses within planning obligations to secure the provision of on-site domiciliary care services. Such services will in due course need to be registered and regulated by the CQC. Further information is provided in [Chapter 17](#).

4.7 Importance of early engagement with RPs

- 4.7.1 Developing new affordable homes is of course necessary and welcome. However, it also entails RPs taking on commercial and economic risks, irrespective of the exact development model used. RPs will also have a continuing role in ensuring compliance with all relevant regulatory requirements in relation to both existing and new stock as well as management of risk.
- 4.7.2 RPs will therefore only undertake development where it is viable to do so and following due diligence to determine and properly mitigate the risks involved. Such risks are likely to include (but not be limited to) the future demand for the letting/sale of properties, which in turn will be impacted by decisions about location, size and specification.
- 4.7.3 RPs are also likely to fund development using their borrowing capacity and may therefore be subject to constraints/criteria determined by lenders.
- 4.7.4 In recent years, a combination of economic and regulatory issues has meant that RPs have tended to become much more discerning over which schemes they are prepared to invest in. They will only do so where they consider the risks acceptable. Amongst other things this means that the content and specification of market-led schemes will be carefully scrutinised.
- 4.7.5 Consequently, developers/promoters of speculative proposals on ‘market-led’ sites/schemes must no longer assume that affordable housing packages – even if otherwise policy compliant – will be readily acceptable to RPs without scheme-specific engagement at pre-application stage.
- 4.7.6 For the above reasons, it is increasingly important that RPs are involved at the outset of the development process in relation to market-led schemes and this process requires careful facilitation.

Chapter Five

5. Self-Build Affordable Housing

5.1 Summary of relevant legal framework

| | |
|-------------|---|
| Topic | Self-build affordable housing |
| Legislation | Self-build and Custom Housebuilding Act 2015 (as amended) |

5.2 Introduction

- 5.2.1 The involvement of RPs is central to the delivery of any of the ‘conventional’ affordable housing delivery models outlined in [Section 4.5](#) above. However, **self-build affordable housing** is another delivery model that may provide a ‘self-help’ solution to peoples housing needs in certain circumstances. For the reasons discussed below, this model might also involve RPs playing an ‘enabling’ role.
- 5.2.2 The context of the self-build affordable housing model is the Government’s **promotion of custom and self-build housing**, although unfortunately there is no separate policy recognition of this as a potential affordable housing supply stream.
- 5.2.3 The Council is required to maintain a **register** of individuals or associations wishing to build their own homes, and both it and certain other public bodies (including Warwickshire County Council) are also required to have regard to this register in exercising certain functions.

5.3 How self-build affordable housing works

- 5.3.1 The essential features of this development model are that individual households or groups of households build their own affordable homes using their own labour to reduce construction costs, and mechanisms are put in place to retain those homes as affordable in perpetuity.
- 5.3.2 Schemes can involve the conversion/refurbishment of existing properties as well as new-build.
- 5.3.3 The District Council acknowledges the agency and initiative of those individuals and households in need of affordable housing in driving the delivery of appropriate solutions to their needs wherever possible.

5.4 Overcoming challenges to delivery

- 5.4.1 In practice, this model will only be economically viable if land/property can be sourced at below open market value and economies of scale achieved to reduce construction and other on-costs costs. Grant funding may still be required, and for this reason it will also be necessary for an entity involved in delivery of a scheme to benefit from RP status to access such funding.

- 5.4.2 Indeed, whilst it is possible for prospective self-builders to form consortia to develop affordable self-build schemes, this will entail setting up the necessary governance, funding and ownership structures. This can be very time-consuming and involve up-front costs. For this reason, and to accelerate delivery, RPs may wish to play a lead role in acquiring land, securing the necessary permissions, providing serviced plots and (to varying degrees) managing the development process.
- 5.4.3 Self-builders are also likely to require specialist mortgage finance, although there are a number of specialist providers operating in the market.
- 5.4.4 Given the practical challenges involved, it is perhaps not surprising that no such schemes have been developed within the District to date. However, the District Council remains open to considering proposals from prospective self-builders. Given the strong scope for synergy with Local Need housing schemes (see [Chapter 15](#) below) individuals or groups with an interest developing this form of self-help solution to their housing needs are encouraged to contact the [Rural Housing Enabler](#) in the first instance to discuss their ideas.

Chapter Six

6. Public Sector Equality Duty

6.1 Summary of relevant legal/policy framework

| | |
|-------------|-----------------------------|
| Topic | Public Sector Equality Duty |
| Legislation | S.149, Equality Act 2010 |
| NPPF | Paras. 161 to 163 |

6.2 Public Sector Equality Duty (“the Duty”)⁴

6.2.1 This is a general legal duty that applies to public bodies (including the District Council) when carrying out their functions. This includes, for example, making decisions on planning applications.

6.2.2 Further general information on the Duty can be found online at: [Public Sector Equality Duty: guidance for public authorities - GOV.UK](#). The Duty does not dictate a particular outcome but does list certain issues to which ‘due regard’ must be had.

6.3 Discharging the Duty when considering residential development proposals

6.3.1 For all applications involving residential development, the most relevant ‘protected characteristics’ for the purposes of the Duty are assessed as ‘age’ and ‘disability’. The requirements of households with these characteristics include (for example):

1. Accessible homes, including external access and space to move around internally safely and comfortably.
2. Warm homes and protection from climatic extremes (such as overheating). This is especially important in the case of elderly or disabled household (or household members) or households with very young children who may necessarily spend more time in their homes compared to, say, households whose members work full time.
3. Space for equipment and adaptations and space for live-in support where necessary, to support independent living.

6.3.2 Ensuring that new or modified housing meets the needs of all sections of the community is also important in:

1. Helping to avoid creating unnecessary additional pressures on an already limited stock of affordable housing.

⁴ See s.149, Equality Act 2010.

2. Mitigating the impacts of climate change (see also **Chapter 7** below).
- 6.3.3 Whilst some aspects of the design and use of homes relevant to the discharge of the Duty are covered by the Building Regulations, it is also appropriate to consider issues falling within the scope of planning control.
 - 6.3.4 Discharge of the Duty is likely to be particularly relevant (but by no means exclusively so) when assessing the performance of proposals for or involving residential development against Policy CS.19 (D) (flexible design and space standards). This matter is discussed further in **Chapter 13** below.
 - 6.3.5 The Duty rests with this Authority rather than the applicant. For this reason, sufficient information needs to be available to enable it to reach informed conclusions.

Chapter Seven

7. Climate Emergency

7.1 Summary of relevant legal/policy framework

| | |
|---------------|--|
| Topic | Climate change, mitigation and adaptation |
| Legislation | Planning and Compulsory Purchase Act 2004 (as amended) |
| NPPF | Sections 2 & 14 (excluding paras. 183 – 186) |
| Core Strategy | CS.2, CS.4, CS.7 & CS.9 |

7.2 Declaration of Climate Emergency

7.2.1 The decision of the District Council to declare a ‘Climate Emergency’ on 15 July 2019 may be capable of being a material planning consideration when making decisions on planning applications.

7.3 Impacts and mitigation of climate change

7.3.1 General guidance and a series of checklists on climate change adaption and mitigation are included in **Part V of the SPD**. This covers all forms of development.

7.3.2 More specifically, the impacts of climate change potentially represent an existential threat to the District’s existing and future housing stock. Preventative, adaptation and mitigation measures should therefore be sought and secured where appropriate to ensure that all new residential development is sustainable.

7.3.3 Such measures are equally applicable to affordable and market housing. Nevertheless, whilst the impacts of impacts of climate change and climate extremes affect everybody, they may be more significant for groups such as the elderly or disabled. They are also the groups to whom the Duty discussed in Chapter 6 above applies; and who for various reasons often tend to have a greater reliance on affordable housing to meet their housing needs and might be expected to spend more time living in their homes and for whom a safe and pleasant homes are therefore essential.

7.3.4 Examples include:

1. **Flood risk.** The implications for residents with mobility/sensory impairments that could hinder safe evacuation in the event of a flooding emergency should be considered. One option might be to ensure the design and location of schemes is such as to validate a ‘shelter in place’ option rather than evacuation.
2. **Overheating.** The elderly and very young are at increased risk from overheating. The design of homes should reflect this, including through the incorporation of

sufficient natural ventilation and cooling features (although this should also take into account likely exposure to sources of noise).

7.3.5 There will also be implications for RPs themselves, for example they will need to:

1. Reflect the impacts of climate change in their asset management strategies and, ultimately, investment decisions.
2. Consider the safety of their residents. Indeed, this is a specific regulatory requirement. Examples could include having evacuation plans in place in anticipation of flooding. There could be a particular issue where large numbers of residents (such as those living in specialised independent living/Extra Care schemes) need to be evacuated at short notice to alternative appropriate emergency accommodation.

Chapter Eight

8. Policy Framework Summary

8.1 Purpose of this Chapter

- 8.1.1 This Chapter provides a broad over-view of the planning policy framework and other procedural requirements against which proposals comprising, including or giving rise to a requirement to provide affordable housing fall to be considered.
- 8.1.2 Advice on the detail of specific policy requirements is included in subsequent Chapters.

8.2 National Planning Policy Framework

- 8.2.1 The **National Planning Policy Framework** (NPPF) sets out the Government’s planning policies for England and how these should be applied. It has a policy rather than a statutory basis: nevertheless, it will often be an important material consideration in planning decisions.
- 8.2.2 The current version of the NPPF was published in December 2024.

8.3 Stratford-on-Avon District Core Strategy

- 8.3.1 The **Core Strategy** was adopted in 2016 and currently forms part of the statutory ‘development plan’ for the District. The following policies are of particular importance to the successful delivery of affordable housing, although others will also be relevant.
- 8.3.2 **Policy CS.18 and associated Development Management Considerations (DMCs).** Amongst other things, these establish a requirement for new residential development to provide affordable housing (for schemes above specific size thresholds and subject to certain exemptions) and the form such provision should take. They also specify key criteria in respect of affordability, tenure, on-site integration and delivery.
- 8.3.3 Paragraph 5.4.9 of the explanatory text to the above Policy provides a reminder that effective affordable housing provision is not just about **quantity**, but of equal importance is ensuring the right type of provision.
- 8.3.4 **Policy CS.19 and associated DMCs.** Amongst other things, these set out strategic objectives in respect of mix and type of housing, the optimum mix of affordable and market housing, the criteria specialised housing schemes must satisfy, and high-level requirements in respect of flexible design and space standards.

8.4 Development Requirements Supplementary Planning Document

8.4.1 The Development Requirements Supplementary Planning Document (“the **SPD**”) provides further detailed guidance on the interpretation and implementation of Core Strategy policies. Of particular importance to the delivery of affordable housing are:

Part S: General and Local Housing Needs.

8.4.2 Briefly, Part S includes guidance on:

- Local Needs housing schemes (see also Chapter 15 below).
- Approach to determining optimum mix, types and tenures of affordable housing (see also Chapter 10 below).
- Management of affordable housing (see also Chapter 14 below).
- Integration of affordable and market housing (see also Chapter 12 below).

Part T: Specialised Housing.

8.4.3 Briefly, Part T includes guidance on:

- Supported Housing (see also **Chapter 17** below).
- Independent living for older people.
- Extra Care Housing (as an alternative to residential care homes and nursing homes).
- Further guidance on the application of the four criteria in Part C of Policy CS.19.

8.5 Neighbourhood Development Plans

8.5.1 Once ‘made’ (adopted) these plans form part of the statutory ‘development plan’ for the neighbourhood area concerned.

8.5.2 They can (but are not obliged to) include policies and specific requirements concerning affordable and community-led housing schemes⁵. Recent legislation has clarified their ability to do so. Some plans within our District already do this.

8.5.3 The majority of the District (by population) is now covered by adopted plans. Copies of those **plans** may be found on the Council’s website.

⁵ See, for example, the NDPs for Bearley, Long Compton, Stratford-upon-Avon and Wellesbourne.

8.6 South Warwickshire Local Plan

- 8.6.1 The **South Warwickshire Local Plan** (“the SWLP”) is an emerging development plan covering Stratford-on-Avon and Warwick Districts in the period to 2050. As such it will eventually replace the Core Strategy.
- 8.6.2 At this early stage in the plan preparation process only very limited weight can be attached to the policies and proposals contained therein. ***This SAN therefore only focusses on the application of existing adopted policies.*** But it will be updated as necessary to reflect the SWLP as it progresses through the statutory processes leading to adoption and the weight that can be afforded to the policies and proposals therein.

8.7 Local Need housing schemes

- 8.7.1 The District Council has for many years promoted and supported the development of community-led housing schemes where these meet an identified local need and continues to do so.
- 8.7.2 Although such schemes are not the subject of a freestanding policy document, they do benefit from special treatment in the Core Strategy, and further guidance is provided in Part S of the **SPD** and **Chapter 15** below.

8.8 Local List and validation

- 8.8.1 The Council’s Local List supplements national regulations concerning the required form and content of planning applications and is used to assess the validity of applications at the point of submission.
- 8.8.2 Amongst other things, the Local List includes a requirement to provide an Affordable Housing Statement where relevant. This can be provided either as a freestanding document or as part of another document – typically a planning statement. Further information may be found in **Section 14.3** below. Whatever the exact form the Statement takes, it must address the detailed issues covered elsewhere in this SAN.

Chapter Nine

9. Overall Affordable Housing Requirement

9.1 Summary of relevant policy framework

| | |
|---------------|--|
| Topic | Overall affordable housing requirement |
| NPPF | Paras. 61, 64 & 65. |
| Core Strategy | Parts A & B, Policy CS.18 |

9.1.1 Specific issues concerning the **Cotswolds National Landscape**, and the **West Midlands Green Belt** are dealt with in **Chapters 18** and **19** respectively below.

9.2 Requirement and thresholds for on-site provision

9.2.1 Part A of Policy CS.18 establishes the requirement that most residential development proposals over the relevant size thresholds must contribute to the provision of affordable housing.

9.2.2 Generally speaking, the applicable threshold will vary according to location as discussed below.

9.2.3 Within the Main Town (**Stratford-upon-Avon**) and the **Main Rural Centres** along with **Mappleborough Green** and **Tanworth-in-Arden** parishes:

- Affordable housing will be required on site for schemes of **11 or more dwellings**, although there are also criteria around gross floor area to consider.
- For schemes of between **6 and 10 dwellings**, provision will normally be off-site.

9.2.4 **Elsewhere:**

- In the case of development of between **6 and 10 dwellings** a requirement for off-site provision applies.
- Affordable housing will be required on site for schemes of **11 or more dwellings**.

9.2.5 The above thresholds were based on guidance in a previous (2018) version of the NPPF. Current guidance is contained in paragraph 65. Briefly, this provides that affordable housing should not be sought from development that is not ‘major’ development – where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more – other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).

- 9.2.6 Consequently in 2019 the District Council published a **Position Statement**. This had the effect of clarifying the practical application of the table to DMC (1) by incorporating the references to site areas introduced by the NPPF

9.3 Designated Rural Areas

- 9.3.1 The reference to ‘designated rural areas’ at 9.2.5 above means to those parts of the District falling within the Cotswolds National Landscape and areas designated by the Government as ‘rural’ under S.157 of the Housing Act 1985. Generally speaking, these comprise the majority of parishes within Stratford-on-Avon District. They are characterised by a population of 3,000 or fewer at the time of designation.
- 9.3.2 A full **list** of such areas may be found on the Council’s website.
- 9.3.3 In this context, the reference to such areas affects the thresholds above which affordable housing is to be sought.
- 9.3.4 There are also implications for the type of lease that should be used for the disposal of Shared Ownership sale properties, although it is not necessary to go into detail here as this matter is dealt with in the Council’s model affordable housing clauses for use with planning obligations.

9.4 Quantum, calculation and rounding

- 9.4.1 Part A of Policy CS.18 requires that **35%** of housing on eligible schemes must be affordable⁶. This is currently calculated with reference to the total number of dwellings proposed.
- 9.4.2 Part B of Policy CS.18 also sets out rules relating to the way the above requirement is calculated, including the approach to be taken when rounding to the nearest whole dwelling.

9.5 Exemptions

- 9.5.1 DMC (3) to Policy CS.18 provides several specific dispensations to the normal requirement to contribute to the provision of affordable housing.
- 9.5.2 In some cases, it will be necessary to secure the use or delivery of development for a particular purpose for it to qualify for the relevant waiver. This can be achieved by way of condition or planning obligation.

Extra Care Housing Schemes

- 9.5.3 Although there is a waiver in respect of Extra Care Housing this does not extend to other forms of *retirement/older persons housing*. It is therefore of considerable importance to establish the exact nature of a scheme if described as ‘Extra Care’

⁶ In a very limited number of cases, a different percentage may be specified. For example, 25% in the case of development within the Stratford-upon-Avon Canal Quarter.

housing to determine eligibility in this way. A planning obligation will normally be required to ensure the provision and availability of on-site domiciliary care for all residents.

9.6 Viability

- 9.6.1 The requirement to provide 35% affordable housing applies unless credible site specific evidence of viability indicates otherwise. In practice, viability issues only arise infrequently, and requests to waive or reduce the normal requirement should be treated with considerable caution.
- 9.6.2 Where viability issues are raised, this should normally be at pre-application stage. Before agreeing to any request to waive or reduce the normal requirement, it is especially important that all avenues that might assist in restoring viability are explored and exhausted. This includes the possibility of securing capital grant ‘gap funding’ from Homes England and/or the District Council.
- 9.6.3 Further advice is provided in national [planning practice guidance](#).

9.7 Off-site provision

- 9.7.1 **On-site** affordable housing provision is always preferred and, above the thresholds described at [Section 9.2](#) above, required. However, the corollary is that **off-site** provision may occasionally be necessary, especially in respect of smaller sites.
- 9.7.2 Applying the normal 35% requirement may well generate a fractional figure. Again, Part B of Policy CS.18 provides the relevant decision-making framework to be applied in such cases, although this is essentially repeated in Section S7 of the SPD.
- 9.7.3 Where a financial contribution towards off-site provision is acceptable or required, as described above, this must be secured by way of a planning obligation. A formula for calculating the required contribution is included in Section S7 of the SPD, along with a statement of associated practices. The necessary Planning Obligation must be entered into prior to the grant of planning permission. It will define the terms and trigger dates for payment of the required contribution. Amongst other things, it will also include provision for indexation as described at paragraph 9.7.4 below. Applicants should contact the relevant DM case officer for confirmation of the exact level of any financial contribution likely to be payable
- 9.7.4 Note that the base contributions set out in [Section S7 of the SPD](#) vary according to whether the development is located in Stratford-upon-Avon parish or elsewhere in the District. Additionally, all contributions will be subject indexation from a base date of 1 April 2017.
- 9.7.5 For schemes proposing **fewer than 11 homes**, it is acceptable for affordable housing provision to take the form of an off-site contribution where on-site provision is not proposed. This includes any fractional contribution – see further below.

Worked example 1

A scheme for **9** open market homes is submitted on a site in Southam. This generates a requirement for **3.15** affordable homes (9 x 35%). A financial contribution will therefore be sought for the whole requirement based on the 'Rest of District' contribution rate plus indexation.

- 9.7.6 For schemes proposing **11 or more homes**, affordable housing must always be provided on-site unless exceptional circumstances have been demonstrated to the Council's satisfaction. Any balance by way of a fractional requirement will take the form of a financial contribution.

Worked example 2

A scheme for **17** open market homes is submitted on a site in Stratford-upon-Avon. This generates a requirement for **5.95** affordable homes: **5** of which must be provided on site, with a fractional contribution equivalent to **0.95** dwelling payable based on the Stratford-upon-Avon parish contribution rate plus indexation.

- 9.7.7 For schemes proposing **21 or more homes**, affordable housing will be provided on-site to the nearest whole unit.

Worked example 3

A scheme for **28** homes is submitted on a site in Alcester. This generates a requirement for **9.8** affordable homes (28 x 35%). This number is then rounded to the nearest whole unit, meaning that the necessary S106 Agreement will require **10** affordable homes to be provided on site, but no financial contribution.

9.8 100% affordable housing schemes

- 9.8.1 Although the normal required level of affordable housing provision is set at 35% - as described in Section 9.2 above – Policy CS.18 also allows for schemes to come forward to deliver more than this amount, up to and including 100% affordable housing provision where this meets an identified need. The terminology 'additionality' is sometimes used to describe such schemes. For clarity, other usual policy criteria concerning site suitability continue to apply.
- 9.8.2 The delivery of such schemes is not usually economically viable without public subsidy in the form of capital grant funding, however some schemes have been successfully developed in recent years within the District. Opportunities can sometimes arise at short notice due to fluctuations in economic conditions. In some circumstances, where housing schemes already benefit from planning permission delivery may be possible without the need for further approval as only a change of tenure rather than any physical changes is involved.
- 9.8.3 Opportunities to deliver such schemes are, of course, generally to be welcomed; albeit with one important qualification. Larger schemes especially should still secure a balance and mix of housing types and tenures, in the interests of ensuring sustainable development by optimising social inclusion. Thus, it would be inappropriate for larger schemes (say 20+ dwellings) to comprise *only* affordable rented housing. In practice, our experience is that such schemes normally also

include an element of housing for Shared Ownership sale so this is unlikely to be an issue.

Chapter Ten

10. Tenure and Stock Profile

10.1 Summary of relevant policy framework

| | |
|---------------|---|
| Topic | Tenure and stock profiles of new affordable housing |
| NPPF | Paras. 61, 63, 64, 66 |
| Core Strategy | Policy CS.19 |
| SPD | Part S, Section S3 |

10.2 Introduction to housing typologies

10.2.1 Before considering the stock and tenure profile of affordable housing schemes in more detail, it is useful to identify the two key typologies for such schemes. Of course, it is possible (although uncommon) to provide both on a single site.

General Needs Housing

10.2.2 This term refers to the vast majority of homes which are provided for rent or sale to households requiring such housing, usually on the grounds of affordability. Indeed, the main distinction between General Needs Housing and Specialised Housing is in terms of its purpose and the level of support and/or care provided.

Specialised Housing

10.2.3 This umbrella term generally two specific categories of scheme:

1. **Extra Care Housing.** This category of housing is designed to cater mainly (but by no means exclusively) for older people who wish to maintain their independence by occupying self-contained accommodation whilst benefiting from the provision of varying degrees of on-site personal care; or
2. **Specialised Supported Housing.** This refers to purpose designed housing catering for the specific support needs of a wide range of client groups. Decisions on commissioning schemes will usually be taken by [Warwickshire County Council](#).

10.2.4 Advice concerning both categories of scheme is provided in [Chapter 17](#) below.

10.3 Introduction to tenure products

10.3.1 The Glossary to the [NPPF](#) identifies a broad ‘menu’ or range of permissible tenure products that meet the definition of “affordable housing”. Part C of Policy CS.18 then identifies certain of those products which are likely to be most effective in meeting

housing needs locally. The table below provides a brief outline of the key features of those products.

| Product | Key features |
|-------------------------|--|
| Social Rent | <ul style="list-style-type: none"> • Rents are set in accordance with a nationally determined formula reflecting local income levels. • Social rents provide the best proxy for genuine affordability. |
| Affordable Rent | <ul style="list-style-type: none"> • Rents are based on a proportion (up to 80%) of prevailing local market values. • As such, they are expensive but, locally, we cap the rents to eligible benefit levels. |
| Shared Ownership | <ul style="list-style-type: none"> • Registered Providers sell homes to eligible purchasers. Typically 10% to 75% of full market value is sold, and rent charged in accordance with a set formula on the remaining unsold equity. • Owners can “staircase” to greater or outright ownership. |

10.3.2 Other ‘niche’ tenure products are considered below.

10.3.3 When determining the most appropriate tenure profile, Part C of Policy CS.18 identifies that it must:

1. Ensure the development of cohesive and stable communities, through the provision of appropriate stock and tenure profiles and management arrangements on each site.
2. Effectively meet the needs of households, including through its availability at a cost low enough for them to afford, determined with regard to local house price and market rent levels.
3. Include provision for homes to remain at an affordable cost for future eligible households or, exceptionally if relevant restrictions are lifted, for the subsidy involved in their development to be fully recycled for alternative affordable housing provision.

10.4 The importance of getting the right tenure and stock profiles

10.4.1 Within the framework of policy and practice outlined in this Chapter it is important to optimise the stock and tenure profiles of new affordable homes. This is as equally important as the actual quantum of development for:

1. **Households and their local communities** as it will directly affect the extent to which their needs are met which will also be a factor in determining whether development is sustainable or not.

2. **RPs** as it will directly affect their assessment of the commercial and regulatory risks involved in development (and hence their appetite/ability partner development in the case of market-led schemes).

10.5 Default expectation of General Needs accommodation

- 10.5.1 The default assumption should be that the affordable housing, where required, will be developed to provide General Needs accommodation. The Council's model affordable housing clauses for use with planning obligations are drafted on that basis.
- 10.5.2 The provision of Specialised Housing is the subject of separate advice in **Chapter 16** below.

10.6 Optimum tenure

- 10.6.1 Part C of Policy CS.18 sets out the following preferred tenure mix, namely:
 - *Maximum* 20% Affordable Rented Housing
 - *Maximum* 20% Intermediate Housing
 - *Minimum* 60% Social Rented Housing.
- 10.6.2 The reference to 'Intermediate Housing' is normally construed as a reference to housing for Shared Ownership sale.
- 10.6.3 The continued appropriateness of the optimum tenure mix above was confirmed in Part S of the SPD (adopted April 2019), which also states that owing to the high costs of housing across the District the greatest need is for Social Rented Housing.
- 10.6.4 Since the SPD was adopted, it has become increasingly apparent that Affordable Rent is an inferior and costly tenure product. In any case:
 1. The proportion set out in the Policy is expressed as a ***maximum***.
 2. The current version of the **NPPF** emphasises the importance of providing Social Rent Housing. For example, NPPF paragraph 64 states that (amongst other things) planning policies should specify the minimum proportion of Social Rent homes required, whilst footnote 90 effectively downgrades the Affordable Rent product.
 3. Although the inferior terms under which tenancies could have been granted have now been rendered obsolete by the Renters' Rights Act 2025, rental costs are still likely to be significantly higher than for comparable Social Rent homes.
- 10.6.5 For the above and other reasons, it is increasingly apparent that it is now no longer appropriate for HPDT to recommend inclusion of Affordable Rent in the optimum mix of affordable rent tenure products locally. Further that such units should therefore be provided as Social Rent units. In other words, a minimum of 80% of affordable homes should be provided as Social Rent units.

- 10.6.6 Shared Ownership houses are understood still to be a popular tenure product. They should therefore still be provided, comprising up to a maximum of 20% of all affordable homes within any given scheme.
- 10.6.7 Delivery of the above tenure profile will be secured via this Authority's published model clauses for incorporation in S106 Agreements: see **Chapter 14** below for further details.

10.7 Reforms Arising from the Renters' Rights Act 2025

- 10.7.1 The Renters' Rights Act 2025 received Royal Assent on 27 October 2025. It introduces major reforms to legislation concerned with rented housing. Whilst many changes will affect the private rented sector (and are beyond the scope of this SAN) there are also implications for the terms under which affordable rented housing tenure products are to be provided. These in turn affects the provisions that need to be included in this Authority's model planning obligation clauses (see **Section 14.5** below).

10.8 Local Needs schemes

- 10.8.1 The composition of Local Needs schemes (see **Chapter 15** below) must be determined with reference to the need profile evidenced by local housing needs surveys (see Chapter 16 below).
- 10.8.2 Bona fide schemes will have been the subject of extensive pre-application consultation and engagement with the host local community. This will normally have been facilitated under the independent auspices of the Rural Housing Enabler.

10.9 Fixed Equity Sale schemes

- 10.9.1 Exceptionally, the provision of affordable housing in the form of Fixed Equity Sale units may be acceptable, although this is not a preferred solution.
- 10.9.2 The key features of this tenure product are:
1. It involves the development of discounted market sale housing, where the maximum sale price is set at no more than 60% of the market value of a property. In other words, it will be sold at a minimum discount of 40% off its market value. There is no rent charged on the unsold equity.
 2. The above discount will be maintained in perpetuity on all subsequent sales.
 3. Sales are arranged directly between the house-builder (or subsequent occupier) and eligible purchasers. The District Council is not involved in making nominations.
 4. The dwelling must be occupied as a sole residence and sub-letting is not permitted without the prior consent of the District Council.
- 10.9.3 A major drawback with this product is that there is no mechanism to ensure its effective targeting to those households with the greatest need, in the same way that

affordable rented (and to a lesser extent Shared Ownership) housing. Consequently, the circumstances in which this product may appropriately be used will be limited: for example, where only a small number of homes are proposed.

- 10.9.4 Many RPs prefer for commercial and management reasons not to develop affordable housing as part of market-led schemes below a certain minimum size, which may fluctuate. This situation again simply serves to validate the essential need for early engagement with an RP.
- 10.9.5 As with the other tenure products discussed above, delivery will be secured via planning obligations. The Council's published model affordable housing clauses include ones specifically for Fixed Equity Sale schemes.

10.10 First Homes

- 10.10.1 First Homes are an affordable housing tenure product first introduced in June 2021 and referenced in the NPPF, although their status has now been downgraded (see footnote 90). It is a form of discounted market sale housing aimed at first time buyers and subject to certain eligibility and cost restrictions.
- 10.10.2 It is not a preferred tenure product locally. The reasons for this include: conflict with the provisions of Policy CS.18; limited effectiveness; the cumbersome administrative burden for this Authority; and overlap with the market for Shared Ownership housing. It is therefore not advisable for it to be included as part of the affordable housing offer, especially on 'market-led' sites.

10.11 Optimum stock profile

- 10.11.1 Part B of Policy CS.19 sets out in a table the optimum stock profile (with reference to bedroom sizes) for both affordable and market General Needs housing.
- 10.11.2 DMC (2) associated with that Policy confirms that it applies to General Needs housing only. The type and mix of Specialised Housing is discussed in [Chapter 17](#).

10.12 Mixed tenure schemes

- 10.12.1 To assist with the integration of affordable and market housing in mixed tenure schemes it is important that there should not be major differences between the respective stock profiles of these categories of housing.
- 10.12.2 In the case of both market-led and land-led schemes for which outline permission is sought, it is essential that a condition is attached to any such permission to secure the submission and approvals of proposals for a stock mix prior to any Reserved Matters application.

10.13 Bungalows

- 10.13.1 Part B of Policy CS.19 states that 1- and 2-bedroom affordable homes should be provided through an appropriate mix of dwelling types, including bungalows. The explanatory text to that Policy further notes that bungalows are a consistently popular option, especially for older people wishing to maintain their independence. Given the District's demographic profile (briefly, it has a higher proportion of older people than the national average) this is not surprising, although bungalows can also be well suited to meeting the needs of younger people with significant mobility impairments.
- 10.13.2 Whilst the above Policy is not prescriptive as to an exact number or proportion of affordable homes that should be provided in the form of bungalows, it does establish a clear expectation that their inclusion should be given serious consideration in individual schemes.
- 10.13.3 It is acknowledged that the provision of bungalows may not be appropriate in every situation. For example, in town centre locations where the need for efficient use of land and urban design coherence may be accorded greater weight. Alternatives, for example flats, can be considered: but will require high standards of accessibility including features such as lifts. This may entail additional costs and maintenance liabilities. Careful discussion of the relative advantages and disadvantages of alternative design solutions with RPs will therefore be essential.
- 10.13.4 As a benchmark, approximately 12% of the District's existing stock of affordable rented homes comprises bungalows⁷.

10.14 Other considerations

- 10.14.1 In addition to all the above considerations concerning stock mix and tenure there are some further matters that may need to be taken into consideration when determining the optimum profile of the required affordable housing. This is particularly relevant to market-led schemes.

1. The quantity and profile of existing affordable housing stock locally

- 10.14.2 For expediency, DM officers are unlikely to need to expressly take this issue into account unless specific local circumstances have been highlighted by HPDT based on available evidence and/or advice provided by the Housing Advice Manager. Examples might include the significant under- or over-provision of particular types or sizes of home, or known difficulties with the letting or sale of particular types/sizes of property.

2. Phasing and timing of delivery

- 10.14.3 This may be a consideration with larger market-led schemes. By 'larger' we mean those schemes that are likely to take more than about 12-18 months to build out.

⁷ As at August 2024. This figure excludes bungalows forming part of sheltered housing schemes.

Assuming a typical average open market sales rate of between approximately 0.6 and 1 dwelling per week, enables a crude assumption this is likely to be particularly relevant to sites of, say, 70-75 or more dwellings in total: where approximately 25 of those might be affordable and the remaining 50 for open market sale. This is not, however, a hard and fast rule.

- 10.14.4 Where larger market-led sites are involved, RPs are more likely to need to make complex multi-year business planning decisions before contracting with a house-builder to receive the required homes. For market-led sites of 70 or more homes an indicative construction programme should therefore be sought. Whilst not binding, this will give greater confidence to an RP as to the prospects for delivery. This is especially important in the case of outline applications, where there is likely to be a longer lead-in time.

Chapter Eleven

11. Bedroom Sizes

11.1 Summary of relevant policy framework

| | |
|---------------|---------------------------------------|
| Topic | Bedroom sizes of new affordable homes |
| NPPF | Para. 61 & 63 |
| Core Strategy | Parts A & B, Policy CS.19 |
| SPD | Part S, Section S3.3 |

11.2 Scope and requirements

- 11.2.1 Part B of Policy CS.19 includes a specific requirement concerning the capacity of bedrooms in all one- and two-bedroom affordable homes.
- 11.2.2 Such homes are required to be built with bedrooms capable of satisfactorily accommodating two occupiers in each bedroom (i.e. double or twin bedrooms) unless an exceptional justification is advanced as part of a planning application.

11.3 Why the requirements matter and national considerations

- 11.3.1 Any assessment must consider who will occupy the proposed homes. Occupants of affordable housing frequently find it difficult or impossible to move to alternative housing because they cannot afford to do so, and/or more suitable housing is unavailable. Therefore, both the size of the bedrooms and other living space in affordable homes is particularly important to households' quality of life. It is unacceptable for properties (of any type) to be inadequately sized because of the harmful effect this will have on the living conditions of occupants.
- 11.3.2 There are two main considerations informing the Council's policy requirements:
- 1. Implications of the "bedroom tax"**
- 11.3.3 Current regulations⁸ set out who is expected to share a bedroom if they are in receipt of certain benefits. Irrespective of the size of a property and how many bedrooms it has, there is a cap, or so called "bedroom tax", on benefits payable to households of a certain size in various locations.
- 11.3.4 Critically the occupancy rules apply to both houses and flats. The regulations do not distinguish between houses and flats and therefore the expected occupancy of these dwellings is the same. In practice this means that, for example in either a flat or a

⁸ Regulation 12B, Housing Benefit Regulations 2006.

house, two children of the same sex aged under 16 years must share a bedroom as must two children regardless of sex aged under 10 years.

- 11.3.5 Many households on the Council's housing waiting list are in work, but some still qualify for Universal Credit, or possibly could do so in future. As RPs do not want households to accrue rent arrears and risk losing their properties, they generally allocate homes using the same property size criteria as set out in the Regulations. This is common practice across England.

2. People with disabilities and/or long-term health issues

- 11.3.6 Nationally, research⁹ has identified that adequate space is also important for people with disabilities and or people with long term health issues. Such people often spend long periods in their home and require additional space to easily move around their homes, for equipment and or overnight carers.

- 11.3.7 In addition, as children may be living in flats (notwithstanding their unsuitability for this purpose) excessive proportions of affordable dwellings in the form of apartments and maisonettes must be avoided. For obvious reasons, RPs are unwilling to develop or acquire schemes with too many flats, thereby prejudicing the successful delivery of schemes overall.

11.4 Size benchmarks

- 11.4.1 The DRSPD states that, when determining whether individual bedrooms in one- and two-bedroom affordable homes are capable of "satisfactorily" accommodating two occupiers, this Authority will have regard to whether they achieve the relevant minimum gross internal floor areas and storage benchmarks specified in the **Nationally Described Space Standard** (NDSS) (March 2015).

- 11.4.2 For the above reason, it is essential that details of actual gross internal floor areas and storage (m²) accompany full and reserved matters applications.

- 11.4.3 The most relevant likely NDSS benchmarks are a minimum floor area of:

1. **50m² (for single storey dwellings) or 58m² (for two storey dwellings)** for **1B2P** units, and;
2. **70m² (for single storey dwellings) or 79m² (for two storey dwellings)** for **2B4P** units.

- 11.4.4 Additionally, the NDSS stipulates that individual bedrooms should have a minimum area of 11.5m² to qualify as a double/twin bedded room.

⁹ See English Housing Survey 2022-23, concerning the predominance of households with a long-term illness or disability, and the difficulties they face moving home – even assuming suitable homes are available.

11.5 Advisory – larger dwellings

- 11.5.1 Other than as described above, there are currently no other specific mandatory requirements that must be met in terms of minimum bedroom sizes or indeed minimum space standards more generally. Nevertheless, in the case of ‘market-led’ schemes, promoters or applicants are advised to check carefully with potential partner RPs to establish whether they have any specific expectations or requirements of their own as to minimum acceptable space standards. This is also good practice, given the lead-in times often associated with the build-out of schemes. This may particularly affect proposals involving three- or four-bedroomed dwellings for rent, where there may be a preference for 3B6P and 4B8P houses over smaller (say 3B5P or 4B6P) homes.
- 11.5.2 In addition, this matter is being addressed as part of ongoing work to prepare the **SWLP**.

Chapter Twelve

12. Integration of Affordable and Market Housing

12.1 Summary of relevant policy framework

| | |
|---------------|--|
| Topic | Integration of affordable and market housing |
| NPPF | Paras. 71, 96, 131, 135, 139 & 140 |
| Core Strategy | Part D of Policy CS.18 |
| SPD | Part S, Section S6 |

12.2 Policy objectives

- 12.2.1 To ensure community cohesion and good design, Part D of Policy CS.18 establishes the high-level principle that (in the case of mixed-tenure schemes) affordable and market homes must be fully integrated in the design of the overall scheme. More particularly, affordable homes must be physically and visually indistinguishable from market homes and dispersed across the site, in clusters appropriate to the size and scale of the development.

12.3 Assessment criteria

- 12.3.1 The above high-level principles are amplified by guidance in **Section S6 of the SPD**. This sets out five specific criteria that should be considered when assessing the performance of proposals against those high-level principles.

| Consideration | Remarks |
|---------------------------------------|--|
| (1) Size and type of home | Ensuring a balanced stock profile of both affordable and market housing is crucial to ensuring their integration. Similarly, their respective formats will be important. |
| (2) External materials | Both market and affordable homes should be built in the same general styles and materials, including boundary and surface treatments. |
| (3) External and garden spaces | The same type of market and affordable homes should have the same amount of external space. |
| (4) Access arrangements | Affordable homes should use the same highways access as market homes and buildings must not have separate entrances for affordable and market residents. |

| | |
|--------------------|---|
| (5) Parking | As with (3) above, the same type of market and affordable homes should have the same siting and level of car and cycle parking. |
|--------------------|---|

12.4 Affordable housing clusters

- 12.4.1 The second limb of Part D of Policy CS.18 is the requirement for affordable homes to be dispersed across a site in clusters appropriate to the size and scale of the development.
- 12.4.2 Because residential development can vary so widely in size and scale, the Policy is not prescriptive in this respect: however, the SPD does set out certain benchmarks against which the performance of proposals should be assessed. More particularly, clusters of around **6** affordable homes work well and should rarely exceed **10**.

12.5 Determining what constitutes a “cluster”

- 12.5.1 What constitutes a “cluster” in any given case must be determined as a matter of fact and degree. However, since the objective of the policy requirement is to ensure the proper integration of different tenures within individual sites, it is good practice to consider likely “street level” perceptions amongst residents and visitors as well as plan form.

12.6 Default provisions on cluster sizes in planning obligations

- 12.6.1 The Council’s model affordable housing clauses for use with planning obligations (see [Chapter 13](#) below) therefore contain a default requirement that clusters of affordable homes shall comprise no more 9 units.

12.7 Practice for outline planning applications

1. Masterplanning

- 12.7.1 In the case of outline planning applications – where the detailed layout and appearance of a site will not necessarily be known – a masterplan (or equivalent) should indicate how the overall policy requirement (including the specific criteria listed in the SPD) will be taken into account in the subsequent detailed design process.

2. Flats/maisonettes and specialised housing

- 12.7.2 The SPD also indicates that flats (including maisonettes) and specialised housing will be given special consideration. This is because there are sometimes management, maintenance of service delivery issues that RPs will need to consider when determining the optimum format for such housing. This also serves to illustrate the importance of early engagement with potential partner RPs in the case of market-led schemes.

Chapter Thirteen

13. Accessibility and Flexibility

13.1 Summary of relevant policy framework

| | |
|---------------|--|
| Topic | Accessibility and flexibility of new housing |
| NPPF | Paras. 96 |
| Core Strategy | Part D of Policy CS.19 |

13.2 Scope of policy

13.2.1 Part D of Policy CS.19 applies equally to affordable and market housing. Therefore, all proposals for or including residential development will fall to be considered against it.

13.3 Why accessible homes matter

13.3.1 The provision of accessible and flexible housing at scale is one facet of sustainable development.

13.3.2 Its widespread provision is also a means by which additional pressures on the District's limited stock of affordable and/or Specialised Housing might be mitigated. Further, that additional pressure on the public purse (for example, due to the need to fund otherwise avoidable property adaptations) is reduced.

13.3.3 It is also relevant to demonstrating discharge of the legal Duty discussed in [Chapter 6](#) above.

13.4 Approach to implementation

13.4.1 The Policy establishes certain high-level criteria against which proposals must be assessed. For example, the provision of sufficient storage space. But it does not prescribe the use of specific design and construction standards. Whilst this can give rise to practical difficulty in its application, possible solutions are considered below.

13.4.2 The starting point is for developers to consider who might live in or visit – or alternatively who might be excluded from living in or visiting any housing they propose to develop. Household needs can change over time; sometimes at short notice (for example, through accident or illness). The design and construction of properties that enable in situ solutions and can be easily and cost-effectively modified is therefore highly desirable, enabling people to maintain independence.

13.4.3 Similarly, the increasing prevalence of home-working should be catered for.

- 13.4.4 As well as access and mobility within the home itself, consideration also needs to be given to the ease of access and mobility within development sites and their setting. Indeed, without this building individual homes to high standards of accessibility would seem pointless.
- 13.4.5 A strategy can then be formulated and documented setting out specific proposals for how the high-level criteria in the Policy might be satisfied in any given case, and specific technical solutions proposed. It may be convenient to embed this in the Design and Access Statement required to accompany the necessary application.
- 13.4.6 As noted, the Policy does not mandate the adoption of a specific standard in any specific case. This does give scope for flexibility. However, we do recommend that consideration is given to designing and building a high proportion of both affordable and market homes to comply with **Building Regulations Approved Document Part M4(2)** and in some cases **M4(3)** standards.
- 13.4.7 In the above respect, it should be noted that although the question of Building Regulations compliance ordinarily falls outside the scope of planning control, the existing planning policy requirement is broader than matters covered by the Building Regulations.

13.5 Practice

- 13.5.1 **Pre-application advice.** Although specific details will not generally be needed at this stage, promoters are nevertheless advised to formulate and outline a strategy for demonstrating how the high-level requirements of the Policy will be addressed as part of any eventual application.
- 13.5.2 **Outline applications.** Although matters such as the detailed design and layout of a site and the design of individual dwellings may not be for consideration at this stage, it is essential that a strategy of the kind discussed above is either submitted as part of the application, or is conditioned for submission and approval prior to Reserved Matters stage.
- 13.5.3 **Full permissions.** The detailed location, design and layout of a development (including that of individual dwellings) will be for consideration at this stage. It is therefore essential that an application includes or is accompanied by sufficient information explaining the detailed design solutions adopted to address the high-level requirements of the Policy. Where appropriate, a condition should be imposed to secure that the development is, in fact, completed in accordance with the solution proposed.

Chapter Fourteen

14. Delivery Arrangements

14.1 Summary of relevant policy framework

| | |
|---------------|--|
| Topic | Delivery arrangements for new affordable housing |
| NPPF | Para. 81 |
| Core Strategy | Part E, Policy CS.18. Also DMC (10) & (11). |
| SPD | Part S, Section S5 |

14.2 Policy background

- 14.2.1 The appropriateness of the delivery arrangements for required or proposed affordable housing fall to be considered against Part E of Policy CS.18 as amplified by DMC (10) & (11) associated with that Policy and **Section S5 of the SPD**.

14.3 Affordable housing statements

- 14.3.1 The SPD requires that planning applications that include provision of affordable homes must be accompanied by an affordable housing statement.
- 14.3.2 In the case of market-led schemes, the SPD further requires (in respect of both full and Reserved Matters applications) such statement:

“Must include confirmation that the estate layout and detailed design of all dwellings proposed as affordable homes has been discussed with, and is considered satisfactory by, a named partner RP.”

14.4 Role of RPs

- 14.4.1 For the reasons outlined in **Chapter 4**, the role of RPs will be crucial to the delivery of affordable housing. To ensure a policy-compliant scheme in this respect again requires early engagement with an RP in the case of market-led schemes. Some of the factors affecting the willingness of RPs to partner the delivery of such schemes are discussed below.
- 14.4.2 Indeed, Section S5 of the SPD includes the following statement:
- “The early involvement of Registered Providers will expedite the delivery of affordable homes and minimize the risk of Providers not taking on the homes because the detailed design and specification of the homes is unacceptable.”*
- 14.4.3 More generally, and since 2022 especially, it has become more apparent at both a national and local level that RPs are increasingly discerning when making choices about those market-led affordable housing schemes in which they would be prepared

to invest. The reasons for this are varied but include increasing financial constraints and risks, along with the need to meet the enhanced requirements of the Regulator of Social Housing. This includes in respect of the repair and upgrading of existing stock they may already own and manage, and can be a major “hidden” constraint in the case of individual RPs.

14.4.4 It is therefore necessary for this Authority to pay much greater attention to performance against relevant policy requirements and the likely acceptability to an RP of individual proposals than may have been the case historically.

14.4.5 Where an RP already owns/manages existing stock in the host settlement, they will also want to ensure that any implications for the future management of that stock are considered.

14.5 Planning obligations

14.5.1 Planning obligations (S106 Agreements or Unilateral Undertakings) have a crucial role to play in securing delivery of the required affordable housing (and ‘local market’ housing in the case of Local Needs schemes). Their use is necessary to meet the requirements of Part E of Policy CS.18.

14.5.2 **Templates** containing the model affordable housing clauses that should normally be used when preparing planning obligations are available to view/download from the Council’s website, along with an Index indicating the appropriate template to use.

14.5.3 Key features of this Authority’s published model clauses include (in summary):

1. Requirements concerning the submission to, and approval by, the District Council of:
 - (1) An **Affordable Housing Specification**, prior to or simultaneously with the necessary Reserved Matters application (or the first such application, if more than one) in the case of an outline application, or prior to the commencement of development in the case of a full application. It will cover the matters discussed in Section 14.6 below.
 - (2) A **Local Lettings Plan** (“LLP”), prior to first occupation of any of the affordable homes. Its purpose is to set out criteria for the allocation of rented properties both on first and all subsequent lettings, with the objective of facilitating the development and maintenance of balanced, cohesive and sustainable communities.
2. Requirements concerning the provision of the required affordable housing in accordance with the approved Affordable Housing Specification, including restrictions on the disposal of open market housing until this has occurred.
3. Provisions regulating the future occupancy and disposal of the required affordable housing. In particular:

- Rights for the District Council to nominate tenants to all affordable rented homes on all first and subsequent lettings are reserved.
- The letting or sale of the affordable homes to eligible households with a qualifying local connection to the host parish in the first instance with a standardised cascade beyond and in accordance with the approved LLP is secured.

14.5.4 A requirement for the affordable housing to be managed in accordance with relevant requirements of the Regulator of Social Housing. Also, a prohibition on the subsequent disposal all or part of it other than in certain limited and defined exceptions.

14.5.5 Drafting of planning obligations will normally be undertaken by the Council’s legal service following instructions from the relevant DM case officer. Such obligations may, of course, include other provisions beyond the scope of this SAN.

14.6 Affordable Housing Specifications

14.6.1 Affordable Housing Specifications (“Specification(s)”) provide the necessary detail to plot-level detail to assure the delivery of the required affordable housing to an appropriate standard on all schemes. The timing of submission is as described above, depending on whether the permission to which it relates in full or outline: but in all cases prior to the commencement of development. Applications for approval of details should be made using the Council’s **pro forma** and accompanied by the relevant fee. The Specification must, of course, be consistent with the terms of both the related permission and planning obligation. The development must be undertaken in accordance with the approved Specification.

14.6.2 Amongst the particulars required to be included in the Specification is the identity of the RP who will develop the affordable homes. In the case of a market-led site, this will be in accordance with a contract. The Specification should cover the whole development, unless (in the case of large schemes) express provision is included in a planning obligation for the phasing of a development (and where such phasing details are conditioned to be approved beforehand) in which case Specification might relate to individual phases.

14.6.3 The approval of a named RP as part of Specifications will normally be a formality (subject, of course, to the RP being duly registered with the RSH) unless there is any evidence to indicate significant doubt as to the ability of the named RP to deliver the approved scheme. This might include, for example, an adverse regulatory grading by the RSH.

14.7 Local Lettings Plans

14.7.1 LLPs are schemes “the objectives of which are to facilitate the development and maintenance of a balanced and sustainable community”. To this end, they specify the arrangements and criteria for the nomination by the District Council or allocation by

the approved developing RP (termed the “Qualifying Developing Body”) of tenants to any affordable rented home within the development (subject, of course, to the overriding restrictions and requirements of the relevant planning obligation). They do not apply to Shared Ownership homes.

- 14.7.2 The Council’s Housing Advice Manager will normally consider and determine requests for approval of LLPs. A model LLP is available.

14.8 Management arrangements and costs for communal areas

- 14.8.1 In the case of ‘market-led’ schemes, RPs will want to carefully scrutinise the proposed arrangements for, and the costs (if any) to tenants/purchasers of, managing and maintaining communal areas within an overall development before agreeing to partner delivery of schemes.
- 14.8.2 The term ‘communal areas’ is used here for convenience and refers *both* to areas that are intended to be transferred directly to the developing RP but will be managed as communal areas *and* areas within the wider development (e.g. parking courts, landscaping, public open spaces etc.) where ownership and management is to be transferred to a third party upon completion.
- 14.8.3 More particularly, as regards areas of public open space and communal landscaping, it should be noted that a framework for the delivery and future upkeep of such areas is set out in **Part L** of the SPD. The implementation of such arrangements will be secured through the inclusion of relevant clauses in a planning obligation. Amongst other things, this should ensure that no additional costs fall upon the tenants or purchasers of affordable housing.
- 14.8.4 As a general principle, the costs relating to the management and maintenance of communal areas should be avoided altogether or at least minimised. The provision of flats/apartments should be avoided, as this will create maintenance liabilities for internal and external spaces. Similarly, provision of on-plot parking spaces is always preferable to providing communal parking spaces. Access road should be designed and built with a view to adoption by the Local Highway Authority.
- 14.8.5 The same principles also apply in the case of Fixed Equity Sale schemes.

14.9 Funding expectations

Introduction

- 14.9.1 Part E of Policy CS.18 states that the provision of affordable housing will be required irrespective of the availability of public subsidy.
- 14.9.2 When appraising development opportunities, and irrespective of the delivery model (see **Section 4.5**), RPs will need to consider not only likely income streams during the economic life of a potential scheme but also likely asset values and maintenance costs: the latter being heavily influenced by specification and build quality determined at planning stage.

Position in respect of ‘market-led’ schemes

- 14.9.3 For the above reasons alone, in the case of ‘market-led’ schemes, early liaison between the scheme promoter/developer is essential. Speculative affordable housing packages promoted in the hope that a competitive offer will eventually emerge are increasingly unlikely to be considered acceptable by RPs.
- 14.9.4 Contract offers are increasingly likely to be the subject of more prudent/conservative assumptions about asset values and maintenance liabilities etc. It is therefore essential that promoters/developers properly reflect these in reduced land values and realistic assumptions about levels of cross-subsidy required from the profits arising from sales income generated by the sale of open market properties.

Position in respect of other development models

- 14.9.5 The general position in respect of other development models, especially community-led schemes, is that there may be less (or on occasion no) scope for cross-subsidy from market sale properties. In addition, there may be (for example) a lack of economies of scale obtainable from smaller schemes and/or significant up-front costs involved in providing the necessary infrastructure. In such circumstances the District Council and Homes England are likely to want to minimise calls on the public purse by prioritising investment into those schemes where there are demonstrable grant requirements to enable their viability.

14.10 Certainty and timing of delivery

- 14.10.1 When considering the performance of proposals against relevant policy requirements, it is useful to consider factors such as:
1. Whether or not the proposed development is acceptable in principle. If not, it obviously follows that the prospects for successful and timely delivery of any required affordable housing will be considerably diminished. This should be weighed in the overall planning balance. In the case of market-led schemes, RPs will be disincentivised from active engagement.
 2. Even if the principle of development is deemed acceptable, in the case of outline applications there will be a need to prepare and submit the necessary Specification prior to the submission of any Reserved Matters application(s). This process will clearly be expedited where a named RP is already engaged; otherwise not.
 3. Also, in the case of outline applications, whether sufficient technical evidence has been submitted to support and validate any assumptions concerning site capacity. Again, in the case of market-led schemes, RPs will be disincentivised from active engagement if this validating evidence is not in place.

4. In the case of requirements for infrastructure provision or upgrades (whether on- or off-site) as a precursor for development (including phased delivery), whether such requirements have been scoped or finalised and costed. Again, in the case of market-led schemes, RPs will be disincentivised from active engagement of this has not already been undertaken. This is especially the case where infrastructure provision and/or upgrades may be necessary to avoid social isolation.
5. Whether an indicative delivery timetable has been drawn-up. This might be founded on assumptions about build-out/sales rates and infrastructure sequencing.

14.11 Annual Reviews and Case Studies

- 14.11.1 To aid understanding and continuous improvement, copies of **Annual Reviews** of the Council's development programme, and **Case Studies** of selected completed housing schemes are available to view/download from the District Council's website.

Chapter Fifteen

15. Community-Led ('Local Needs') Housing

15.1 Summary of relevant policy framework

| | |
|---------------------|---|
| Topic | Community-led ('Local Needs') housing schemes |
| NPPF | Para. 76 |
| Core Strategy | CS.15 |
| SPD | Part S, Section S2 |
| Neighbourhood Plans | As applicable |

15.2 Purpose

15.2.1 The District Council attaches particular importance to the delivery of further community-led housing schemes, also referred to as 'Local Needs' schemes (see explanation on terminology in [Section 15.3](#) below).

15.2.2 Such schemes make a valuable contribution to the continued sustainability and vitality of the District's many local communities. This is especially the case with our villages where a combination of demographic issues, high house prices, and an acute shortage of existing affordable housing stock present particular challenges, but whose rural character is a fundamental characteristic of our District. This Chapter therefore provides advice on issues relevant to the successful delivery of such schemes.

15.2.3 Numerous schemes have been successfully delivered since the inception of the 'Local Needs' initiative by the Council.

15.2.4 It is also important to protect the public reputation of such schemes by ensuring they are genuinely 'community-led' and not abused by what may in reality be 'developer-led' schemes. Relevant guidance is provided in the [SPD](#) and below.

15.3 Terminology

15.3.1 What is now termed the 'Local Needs' initiative has been in operation for about two decades. During that time, it has also been known as 'Local Choice' initiative. Schemes are also commonly referred to as 'rural exception' schemes, and sometimes all these terms are used interchangeably. The slight difference in terminology reflects the scope for 'local market' housing (see paragraph 14.4.4 below) as well as affordable housing. Although these differences in terminology may be a potential source of slight confusion, their substantive purpose remains the same. For the sake of consistency proposals under this initiative are referred to 'Local Needs' housing schemes within this SAN.

15.4 Scope

- 15.4.1 The initiative applies across the whole District, including Stratford-upon-Avon.
- 15.4.2 Development of Local Needs schemes is acceptable within the **West Midlands Green Belt** (see [Chapter 19](#)) by virtue of Part G of Policy CS.15 and criterion a of Policy CS.10, subject to it not being harmful to the openness of the Green Belt.
- 15.4.3 Similarly, development of schemes within (what is now) the **Cotswolds National Landscape** (see [Chapter 18](#)) is also acceptable by virtue of Policy CS.11 applying Policy AS.10 but must not harm the historic or built character, local distinctiveness or landscape character of (what is now) the CNL.
- 15.4.4 Schemes can also include ‘local market’ housing as well as affordable housing, although the same requirements apply in terms of a local need being evidenced and occupancy restrictions applied.
- 15.4.5 Although outside the scope of this SAN, the policy framework outlined above also provides scope for meeting other identified local community needs as well as housing. For example physical and social infrastructure, including open space.

15.5 Principle of development

- 15.5.1 The strategic policy framework within which Local Needs schemes can be promoted is provided by Part G of Policy CS.15. Dwellings provided through such schemes will contribute to meeting the overall housing requirement for the District. This Policy is amplified by the criteria set out in [Section S2 if the SPD](#). Briefly, such schemes must:
1. Have the support of the local community.
 2. Respond to an identified local need.
 3. Be available to people with a local connection to the host parish.
 4. Be small-scale.

15.6 Community-led nature of development and community engagement

- 15.6.1 Local Needs schemes are, by definition, instigated by the local community. However, for the reasons discussed in [Section 15.9](#) below much of the necessary technical preparatory work and actual delivery is in practice led by RPs and (where ‘local market’ housing is also provided as part of schemes) smaller private-sector house-builders. The early stages of such schemes will normally be facilitated through work with the [Rural Housing Enabler](#): see [Section 15.10](#) below.
- 15.6.2 It therefore follows that providers should have engaged fully with the host local community at pre-application stage to present and explain their proposals, and only

proceed to application stage where local community backing has been secured. Indeed Policy CS.15 establishes an explicit policy test in this respect, requiring that promoters of such schemes will engage with the local community, including through the neighbourhood planning process where such a plan is under active preparation, prior to the submission of a planning application.

15.7 Scheme profile and relationship to local housing need

- 15.7.1 It is a fundamental feature of Local Needs schemes that their profile in terms of the type, size and tenure of homes is driven by evidence of an unmet local housing need. In practice this is most likely to take the form of a local housing needs survey undertaken by the Rural Housing Enabler. Further information on this matter is provided in [Chapter 16](#) below.

15.8 ‘Cluster’ schemes

- 15.8.1 Section S2.3 of the SPD explains that in certain circumstances, and if supported by the parish/town council concerned, the principle of ‘cluster’ schemes – a development on a single site serving two or more local communities – is supported.

15.9 Scheme delivery and future occupancy

- 15.9.1 Although schemes are developed under a distinct policy initiative as described above, this Authority’s experience is that their delivery mechanisms and future occupancy controls are in practice very similar for ‘conventional’ affordable housing schemes.
- 15.9.2 There is scope for delivery of Local Choice schemes by entities created especially for this purpose: see definition of ‘Community-led development’ in Annex 2 (Glossary) of the NPPF. This could include, for example, a local community land trust. But whilst this remains an option open to local communities, again in practice they usually find it quicker and more economically viable to use the good offices of RPs who specialise in the delivery of such schemes. Beyond the initial phases of site identification and scheme inception, there is increasingly a considerable amount of detailed technical and design work involved in advancing schemes to planning application stage and securing the necessary funding.
- 15.9.3 For the above reasons, this Authority’s suite of planning obligation templates (see [Chapter 19](#) below) includes a ‘dedicated’ template for this type of scheme. But for reasons of efficiency and effectiveness the requirements and procedures contained therein very closely model those used for ‘conventional’ affordable housing schemes involving an RP.

15.10 Stratford-on-Avon Rural Housing Enabler Project

- 15.10.1 Since 2003, [Warwickshire Rural Community Council](#) (WRCC) have been contracted to provide the services of a full-time **Rural Housing Enabler** covering Stratford-on-Avon District. This is a valuable independent resource available to provide advice and assistance to all parties interested in promoting Local Needs housing schemes.

15.11 Role of Rural Housing Enabler

15.11.1 The Rural Housing Enabler will normally have played a key role in the inception of Local Needs schemes. Workstreams at pre-application stage will typically include:

1. Explaining the principles of such schemes to local communities (normally represented by their parish or town council) and securing their agreement to proceed further.
2. Establishing the local need for a scheme: see **Chapter 16** below.
3. Facilitating a site canvassing exercise to identify one or more suitable sites for a scheme. The local community will then have the option of either pursuing a freestanding scheme or allocating a preferred site or sites specifically for this purpose in a Neighbourhood Plan. The latter option has the advantage of conclusively establishing local community support for a particular site. The need for independence and impartiality – and the need to be seen as independent and impartial – in this process is especially important and hence the use of an ‘outside’ facilitator in this respect is advantageous.
4. Introducing a partner RP to the parish/town council concerned and other interested parties including land-owners willing to collaborate in working-up detailed proposals.
5. Facilitating community consultation on sketch proposals, with a view to their refinement to reflect any views expressed.

15.12 Approach to single dwellings

15.12.1 Most Local Needs schemes will comprise multiple dwellings. However, Section S2 of the SPD makes specific reference to the approach to be taken by this Authority in the case of single dwellings. These are more likely to involve delivery as custom or self-build dwellings and, as such, an RP is unlikely to be involved. The distinguishing features are:

1. A specific need for such a dwelling would have been identified in a local housing needs survey (see **Chapter 16**) and is supported by the local community.
2. The need for a planning obligation to restrict occupancy to households with a **local connection** to the host parish as well as the normal requirement for delivery as a custom/self-build dwelling.

Chapter Sixteen

16. Local Housing Needs Surveys

16.1 Summary of relevant policy framework

| | |
|---------------------|---|
| Topic | Role of local housing needs surveys |
| NPPF | Para. 82 |
| Core Strategy | Policy CS.15 Parts F & G, DMC (1) & (2) |
| Neighbourhood Plans | As applicable |

16.2 Role and status of surveys

- 16.2.1 Local housing needs surveys play a variety of roles, but for development management purposes will usually provide evidence to justify the development of community-led housing schemes promoted under Parts F or G of Policy CS.15.
- 16.2.2 Such surveys will normally cover a single parish, although occasionally the findings of two or more surveys may be used to support the development of ‘cluster’ schemes.
- 16.2.3 Surveys will normally be commissioned by the parish or town council concerned but will only constitute a material consideration once the resulting survey report is adopted and published by them.
- 16.2.4 Surveys will normally be commissioned from the [Rural Housing Enabler](#) (see [Chapter 15](#)). They also normally follow a standardised format, although the commissioning town/parish council is free to instruct the use of additional or customised questions.

16.3 Survey findings

- 16.3.1 The findings of surveys will, in the first instance, be used by the commissioning parish/town council to inform the preparation/review of Neighbourhood Plans and/or drive decisions about the promotion of freestanding Local Needs housing schemes.
- 16.3.2 Reports of surveys will contain information not only about the overall level of unmet housing need within the survey area but also its composition in terms of the tenure and size of additional housing required.
- 16.3.3 Market-led housing schemes will be contributing towards meeting District-wide housing needs (see DMC (11) associated with Policy CS.18). However, the findings of local housing needs surveys can also be used to inform decisions about the optimum range and mix of dwellings on such schemes, with a view to prioritising local needs.

- 16.3.4 Copies of current adopted [local housing needs surveys](#) may be found on the District Council's website.

16.4 Duration and validity

- 16.4.1 Local housing needs surveys only represent a snapshot of the position at the time the survey fieldwork was undertaken. As such, they do not have a finite 'shelf life'. That said, good practice is that their findings should no longer be considered reliable after a period of more than five years from the date of adoption. After this time, it is considered preferable to undertake a fresh survey. However, this is not a hard-and-fast rule: another consideration is what (if any) housing has been developed or is in the pipeline since the original survey was undertaken.

Chapter Seventeen

17. Specialised Housing

17.1 Summary of relevant policy framework

| | |
|---------------|---|
| Topic | Specialised housing schemes (affordable and market) |
| NPPF | Paras. 61, 63 & 64 |
| Core Strategy | Policy CS.19, Part C |
| SPD | Part T |

17.2 General principles

17.2.1 Part C of Policy CS.19 (concerning Specialised Housing) applies to both market and affordable housing. Brief explanations of the terminology used to describe different types of scheme is provided in [Section 3.3](#) above and [Part T](#) of the SPD so is not repeated here.

17.2.2 Subject to compliance with the strategic considerations in Policy CS.16 and the four criteria below and as set out in Part C of Policy CS.19 itself, the default position is that such schemes will be supported.

17.2.3 All the following criteria need to be met:

1. The type of specialised accommodation proposed meets identified District needs and contributes to maintaining the balance of the housing stock in the locality;
2. The proposal relates well to the existing settlement and provides easy access to services and facilities, including public transport, enabling its residents' to live independently as part of the community.
3. The design of the proposal, including any individual units of accommodation, is capable of meeting the specialised accommodation support and care needs of the occupier; and
4. Arrangements are in place to ensure the delivery of appropriate care and support packages.

17.2.4 More detailed guidance to assist in the application of the above criteria may be found in [Section T6 of Part T](#) of the SPD.

17.3 Accessibility and integration

17.3.1 Particular care needs to be taken when assessing the likely performance of proposals against the second criterion in Part C of Policy CS.19. This is because the households or household members to be accommodated in such schemes may be more likely to

be affected by mobility impairments and/or other vulnerabilities. See also [Chapter 13](#) above concerning accessibility and flexibility.

17.4 Stock mix

- 17.4.1 DMC (2) associated with Policy CS.19 confirms that the optimum stock mix set out in Part B of that Policy does not apply in the case of Specialised Housing schemes. Instead, decisions will need to be made on the basis of the available evidence as to the type of housing and the need that the scheme is intended to satisfy.

17.5 Compliance documentation

- 17.5.1 Given that such housing is, by definition, specialised, it is reasonable to expect the case in support of such housing to be fully documented ideally at pre-application stage and certainly at application stage. Such case should cross-reference all four criteria reproduced at 16.2.3 above.

17.6 Role of Warwickshire County Council

- 17.6.1 The role of [Warwickshire County Council](#) in its capacity as Adult Social Care Authority as a planning consultee is outlined in [Section 3.3](#) above. They also have a commissioning role. As such, the capital funding considerations discussed in [Section 14.8](#) below will be relevant and *in addition* the funding arrangements to cover the revenue costs associated with the ongoing operation of schemes may also be relevant.
- 17.6.2 The District Council would normally expect to be closely guided by their technical assessment of individual proposals. This should also assist in making the required determination as described above.

17.7 Implications of recent changes in the law

- 17.7.1 The aims of the **Supported Housing (Regulatory Oversight) Act 2023** are to cultivate a more strategic approach to the provision of ‘supported housing’ and curb abuses in the provision and management of certain types of such housing. Amongst other things, the District Council is required to prepare a ‘supported housing strategy’ in collaboration with the County Council and will need to introduce a licensing system.
- 17.7.2 The new legislation applies to both new and existing Supported Housing schemes and mostly in the case of **existing** schemes these will not be subject to further planning control. In the short-term at least, the new arrangements may be unlikely to have a direct effect on proposals emerging through the planning system. However, it is prudent to advise prospective developers to assess the possible implications of the new law for their proposals.

Chapter Eighteen

18. Cotswolds National Landscape

18.1 Summary of relevant policy/legal framework

| | |
|---------------------|---|
| Topic | Housing development in Cotswolds National Landscape |
| Legislation | Countryside and Rights of Way Act 2000 (as amended) |
| NPPF | Paras. 189 & 190 |
| Core Strategy | CS.11 |
| Neighbourhood Plans | As applicable |

18.2 Background

18.2.1 Parts of the District falls within or affect the setting of the Cotswolds National Landscape (“the CNL”)¹⁰. This gives rise to certain points of policy and practice that may have implications for affordable housing provision.

18.2.2 The [Cotswolds National Landscape Management Plan 2025-2030](#) (“the Management Plan”) was endorsed by the District Council on 2 June 2025. Amongst other things, it will be a material consideration in decisions on planning applications.

18.2.3 The NPPF¹¹ indicates that proposals for major development should be refused other than in exceptional circumstances. However, Policy CE15 in the Management Plan does provide a framework for prioritising meeting affordable housing requirements.

18.2.4 Several Local Needs schemes have been successfully delivered within settlements within or on the edge of the CNL, and the Council wishes to encourage further such schemes where appropriate. A positive framework for such schemes is provided by Policy CS.11; in turn applying Policy AS.10 (see also [paragraph 15.4.3](#) above).

18.3 Consultation

18.3.1 Policy CS.11 states that in determining planning applications in and adjacent to (what is now) the CNL the Council will work closely with the [Cotswolds Conservation Board](#) (“the Board”).

¹⁰ Formerly known as the Cotswolds Area of Outstanding Natural Beauty.

¹¹ See NPPF para. 190. In this context the term ‘major development’ must be interpreted with reference to footnote 67 of the NPPF.

- 18.3.2 Separate consultation arrangements are in place for development within or affecting the setting of the CNL. The detail of those arrangements fall outside the scope of this SAN. However, they may be relevant to the issues discussed below.
- 18.3.3 The Board have published thresholds for planning consultations. Of relevance from a housing delivery perspective are those requiring consultations to be raised in respect of ‘major development’. Those thresholds are, in fact, identical to those mentioned at **Chapter 8** above. In practice this means that residential development proposals that attract an affordable housing requirement are also likely to attract a consultation requirement.
- 18.3.4 In addition, ‘non-major’ development of schemes of between 1 and 9 dwellings may in some circumstances also attract a consultation requirement. This may be relevant to some Local Need schemes, particularly in or on the edge of Local Service Villages: for example, Ilmington, Long Compton and Tysoe.

18.4 Statutory duty in respect of the CNL

- 18.4.1 Separately, the Board have also published standing advice on the statutory duty to seek to ‘further the purposes’ of protected landscapes¹². This duty came into force in 2023.
- 18.4.2 Often when RPs develop small-scale ‘Local Needs’ schemes, they will include areas of open space and landscaping that will (unless otherwise agreed with the relevant parish/town council) be managed as a single entity. This offers advantages in terms of, for example, promoting biodiversity.
- 18.4.3 Bringing the consultation requirements and statutory duty discussed above together, it would be prudent for DM officers to advise scheme promoters to discuss their proposals with the Board at pre-application stage.

18.5 Affordable housing requirement

- 18.5.1 In practice, most housing schemes within or affecting the setting of the CNL are likely to take the form of Local Needs schemes. In other cases, the normal 35% requirement discussed in Chapter 9 will apply as this currently applies uniformly across the District.
- 18.5.2 Notwithstanding the above position, the **Board Position Statement on Housing** (2021) includes a recommendation that when local planning authorities review their local plans they should give consideration to requiring (amongst other things) at least 50% affordable housing in market-led housing developments. Whilst this is, of course, a matter that will need to be pursued in the context of ongoing work to prepare the **SWLP**, it is considered prudent to advise prospective developers of this possible approach.

¹² See s.85 of the Countryside and Rights of Way Act 2000 (as amended).

Chapter Nineteen

19. West Midlands Green Belt

19.1 Summary of relevant policy framework

| | |
|---------------------|---|
| Topic | Housing development in the West Midlands Green Belt |
| NPPF | Para. 67, 156 & 157 |
| Core Strategy | CS.10, CS.15 |
| Neighbourhood Plans | As applicable |

19.2 Background

19.2.1 A large part of the District falls within the West Midlands Green Belt, wherein special policy considerations apply to development. General policy may be found in [Policy CS.10](#) and Green Belt boundaries in the [Policies Map](#).

19.3 Scope for Local Need housing schemes

19.3.1 Particular attention is drawn to the scope to develop small-scale Local Needs housing schemes within the Green Belt (see also paragraph [15.3.2](#) below). Several such schemes have been successfully developed in recent years.

19.4 Affordable housing requirement

19.4.1 In respect of market-led schemes the current 35% affordable housing requirement applies uniformly across the District (see [Chapter 9](#) below) including the Green Belt.

19.4.2 However, subsequent changes to the [NPPF](#) introduced ‘Golden Rules’ on land released from the Green Belt through plan preparation or review or on sites in the Green Belt subject to a planning application (NPPF paras. 156 & 157 refer). In the event that they are engaged, this has the effect of raising the affordable housing requirement to **50%**¹³ on those parts of the Green Belt within our District. In such circumstances the role of RPs will be fundamental to their successful delivery and the issues discussed in [Chapter 14](#) below concerning their role and engagement especially important.

19.4.3 For clarity, the ‘Golden Rules’ apply to ‘major’ development meaning, for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.

¹³ Based on the current 35% requirement plus a 15 percentage points uplift as per NPPF para. 157.

Chapter Twenty

20. Infrastructure

20.1 Introduction

20.1.1 The provision of the full range of adequate and appropriate infrastructure is fundamental to the successful and sustainable development of all new housing – equally both affordable and market. Although its provision in relation to residential development **as a whole** is beyond the scope of this SAN, there are issues that are relevant to affordable housing that all interested parties need to be aware of.

20.2 Climate change

20.2.1 As noted in **Chapter 6** above, the impacts of climate change whilst affecting everybody, may be more significant for certain vulnerable groups – and which groups are likely to be more reliant on affordable housing to meet their needs. This is equally as applicable to infrastructure requirements as it is to the home environment.

20.3 Accessibility and flexibility

20.3.1 This issue is covered in more detail in **Chapter 13** above. The availability of and - equally – connectivity to the full range of physical and social infrastructure is especially important in the case of Specialised Housing, on account of the fact that residents of such housing are more likely to be affected by mobility impairments. However, it is also important for General Needs accommodation to avoid creating avoidable pressures on some categories of Specialised Housing.

20.4 Engagement with RPs

20.4.1 In the case of market-led schemes, RPs will wish to be satisfied that the developers/promoters of such schemes have fully scoped and assessed the likely demands on and accessibility to the full range of physical and social infrastructure necessary to support their proposals.

20.5 Engagement with Warwickshire County Council

20.5.1 In the case of all forms of Specialised Housing, the **County Council** will wish to be satisfied that the location is appropriate taking into account the specific needs of the residents likely to occupy such housing. This issue is covered in more detail in **Chapter 17** above.

Chapter Twenty - One

21. Feedback and Review

- 21.1.1 This SAN will be kept under periodic review and may be updated from time-to-time without notice.
- 21.1.2 The District Council hopes this SAN will be of assistance to all interested parties. Feedback is always welcome. Please contact housing.policy@stratford-dc.gov.uk with any queries or suggestions or if you spot any errors or omissions.
- 21.1.3 Appreciation is expressed to all stakeholders who commented on the draft version of this SAN.



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