



Strategy & Enabling Planning Consultation Response:

Planning Application Number: 22/01878/P

Land At Broom Hill/Brislington Meadows Broomhill
Road Bristol BS4 4UD

Ward/Zone: Brislington East

Case Officer: Richard Sewell

Proposal: Application for Outline Planning Permission with some matters reserved - Development of up to 260 new residential dwellings (Class C3 use) together with pedestrian, cycle and vehicular access, cycle and car parking, public open space and associated infrastructure. Approval sought for access with all other matters reserved. (Major)

Applicant: Homes England

Affordable Housing Requirement

The Council's planning policies for affordable housing in Bristol are set out in [Policy BCS17: Affordable Housing Provision](#) in the Core Strategy Local Plan (Adopted June 2011), and [Policy DM3: Affordable Housing Provision: Smaller Sites](#) in the Site Allocations and Development Management Policies Local Plan (Adopted July 2014). Further guidance on the Council's affordable housing policies is set out in the [Affordable Housing Practice Note 2018](#) (AHPN).

The site falls within the South zone and is subject to 30% Affordable Housing requirement.

Tenure

The tenure requirement is for 75% Social Rent and 25% Shared Ownership, or other affordable home ownership such as First Homes.

If First Homes are to be delivered the Affordable Housing Statement submitted with the planning application should include proposed sales values for each house type/size, evidenced by a formal RICS valuation. This will enable identification of the appropriate units to be delivered as First Homes, where relevant to ensure that after 30% discount the sales values are not in excess of £250,000.

Further details on the delivery of First Homes is available in the Council's guidance note at: the [Delivery of First Homes in Bristol](#) and further information is in the [National Planning Practice Guidance](#).

Unit size and type

It is expected that the affordable housing contribution will address identified housing needs and reflect the proportions of property types and sizes in the overall scheme and contribute to balanced and sustainable communities in Bristol. The proposed offer size mix is as follows:

Unit Type No. %

1 Bed Flat 51 20%

2 Bed Flat 32 12%

2 Bed House 108 42%

3 Bed House 57 22%

4 Bed House 9 4%

Total 257 100%

We will require that the affordable housing mix is in line with the market size mix, providing both a number of smaller units to aid downsizing and cater to the high demand from smaller households on Bristol Home Choice register and also offering larger family sized units.

Bristol City Council's Core Strategy Local Plan Policy BCS18 expects residential developments to provide sufficient space for everyday activities and to enable flexibility and adaptability by meeting appropriate space standards. The [Space Standards Practice Note](#) provides further information on the implementation of policy BCS18.

The Council has applied the Nationally Described Space Standard (NDSS) as the appropriate space standard for particular forms of residential development. The NDSS table is referenced below from the [Technical housing standards nationally described space standards](#).

To meet housing need effectively it is important that 2 bed units can accommodate 4 persons and 3 bed units 6 persons where possible.

Distribution of units

In this respect the applicant's proposal for the layout of the scheme as set out in the Affordable Housing Statement and D&A raises concerns as most of the smaller flatted units are grouped together in the East of the site. Care should be taken that this area is not dominated with affordable units and that the affordable units are spread around the site.

Accessible housing

There is a high demand in the City for affordable housing for people with disabilities. The 2018 [Urban Living SPD](#) recommends that 90 per cent of new build housing meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation M4(3) 'wheelchair user dwellings'.

Furthermore, Policy DM4: Wheelchair Accessible Housing set out in the Site Allocations and Development Management Policies Local Plan, requires 2% of new housing within residential developments of 50 dwellings or more to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users has been interpreted by reference to [Building Regulations Approved Document M: Access to and use of buildings - Volume 1: Dwellings - Optional requirement M4\(3\): Category 3 - Wheelchair user dwellings](#). Please find further information [here](#).

It does not appear that any of the units are proposed to meet M4(2) standard. We encourage the applicant to meet the urban Living SPD target of 90% so that the scheme is sustainable and can cater to changing needs and the ageing population.

Approved Housing Provider

The developer is expected to provide affordable homes on site without any public subsidy. The affordable units should be transferred to a Registered Provider who is a member of the HomesWest partnership.

Rents & Service Charges

Rents for Social Rented units should be set according to the relevant government formula.

The service charge is the amount payable on an affordable housing unit in addition to the rent/mortgage due. It should include all estate management charges, ground rents, services, repairs, regular maintenance items such as cleaning and grounds keeping, and the insurance of the building. Sinking funds may be charged additionally to service charges. Sinking Charges should only be set to recover the replacement costs of items or areas of the building at their expected end of 'life' as part of programmed repairs for the building.

To ensure the relative affordability of units, total service charge costs should not exceed £650 for an affordable unit. This figure is benchmarked to 2018 and can be inflated by CPI annually. The total costs of rent + service charges for all affordable units must not exceed the current [Local housing Allowance rates](#), this may mean that the services charges cannot be raised in certain years. Early consultation is recommended, as good design can overcome the need for high service charges.

Where schemes are facing particular difficulties remaining within the cap, such as, but not limited to, additional requirements through the planning process, or delivering a complex site with additional costs, exemptions can be requested via the Strategy and Enabling team to raise the cap level. These will be reviewed on a case-by-case basis and should be requested as early as possible in the development process.

Developers/ development management companies must not make profit on service charges and can only charge costs that are reasonable to the services they deliver.

Enabling Fee

An Enabling Fee will be payable when each affordable home is substantially completed. These fees are designed to maximise affordable housing delivery in the city by assisting registered providers with support on planning, property and highway issues.

A fee of £550 per affordable home index linked from 1 October 2017 will apply.

The fee is paid to the Council on substantial completion of each of the affordable homes and applies to Social Rent, Affordable Rent, Intermediate Rent and other Intermediate affordable housing tenures procured through s106 negotiations and delivered without public subsidy or through re-provision/remodelling, extra care housing and 100% affordable housing schemes

Affordable Housing Demand

BCC Housing Register - Applications

Across Bristol's South there is a high demand for social housing, with 4,126 applicants as of the 1st April 2021. The caveat to this information is that applicants are required to input their current address as opposed to their desired location which means it's possible that a significant proportion may desire to be housed elsewhere in Bristol. The highest demand is for one- and two-bedroom properties, which reflects a city-wide trend.

No. Bedrooms	Bishopsworth	Brislington East	Brislington West	Filwood	Hartcliffe & Withywood	Hengrove & Whitchurch Park	Knowle	Stockwood	Total
1	125	168	242	358	548	215	169	168	1993
2	104	135	87	218	396	185	83	81	1289
3	44	49	45	135	264	71	49	41	698
4+	6	5	8	34	56	11	18	8	146

The table below shows the number of applicants within each band, one to four. Band 1 contains applicants with the highest housing need and Band 4 the lowest.

Band	Bishopsworth	Brislington East	Brislington West	Filwood	Hartcliffe & Withywood	Hengrove & Whitchurch Park	Knowle	Stockwood	Total
1	4	4	12	38	48	13	12	10	141
2	26	26	45	98	176	67	30	35	503
3	84	109	95	229	468	126	76	101	1288
4	165	218	230	380	572	276	201	152	2194
Total	279	357	382	745	1264	482	319	298	4126

The average wait time for households allocated a property across all bands and all bed sizes was 477 days. It is important to note that this average includes offers made to age restricted accommodation, and direct offers which will usually have a shorter wait time. There were only 25 4-bedroom properties allocated in this time period which had an average wait time of 979 days. Whilst the need is highest in 1 and 2 bedroom data according to number of applicants, the turnover of these properties is far greater and the wait time generally shorter as a consequence.

We welcome further discussion with the applicant regarding the layout, location and mix of affordable units on this scheme.

Bryony Stevens MRICS, CIHCM Enabling Manager

07/06/2022