



# Joint Core Strategy Affordable Housing Guidance Note (AHGN)- November 2025

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## Section 1: Introduction to the Joint Core Strategy Affordable Housing Guidance Note (AHGN):

### Purpose of the Joint Core Strategy AHGN:

- 1.1 This Joint Core Strategy (JCS) Affordable Housing Guidance Note (AHGN) outlines how adopted JCS and Local Plan affordable housing policies are interpreted in practice. It has been prepared following feedback from officers, developers, and stakeholders in the day-to-day assessment of planning applications, recognising the complexity of affordable housing negotiations.
- 1.2 The AHGN collates all relevant policy and guidance across the JCS authorities (Cheltenham Borough Council, Gloucester City Council and Tewkesbury

Borough Council) into a single document to support consistent affordable housing policy implementation.

- 1.3 The AHGN will support timely decision making and planning processes to create cohesive communities and secure much-needed affordable housing delivery.
- 1.4 The AHGN will inform the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP) policy development through proactive engagement with developers and key stakeholders. Technical terms used can be found within the [Glossary](#).

### The Planning Status of this Guidance Note:

- 1.5 This guidance note will be a material consideration informing planning application proposals, from pre-applications through to planning submission, applying to both residential and mixed-use development.
- 1.6 Whilst the JCS largely determines affordable housing delivery, the AHGN also clarifies the implementation of adopted Local Plan policies.
- 1.7 The latest district-level Local Plans are found below:
  - i. [Gloucester City Plan](#)
  - ii. [Cheltenham Borough Local Plan](#)
  - iii. [Tewkesbury Borough Local Plan](#)

## Section 2: National and Local Planning Policies

### The National Planning Policy Framework (NPPF):

- 2.1 [The National Planning Policy Framework \(NPPF\)](#) sets out the Government's economic, environmental, and social planning policies for England. [Appendix 2](#) provides further details around relevant NPPF sections. The [Planning Practice Guidance](#) supplements the NPPF. Both documents should be read together.

### Defining Affordable Housing:

- 2.2 The JCS uses [NPPF](#) Annex 2 to define affordable housing. This includes a requirement for affordable housing to be managed by a [Registered Provider \(RP\)](#).

### The Joint Core Strategy (JCS) and Affordable Housing Planning Policy:

- 2.3 [The JCS](#) identifies that 35,175 new homes are required between 2016-2031 to meet housing need, including a substantial affordable housing need requirement.
- 2.4 The main policies relating to affordable housing are JCS Policies SD3, SD4, SD11 and SD12.

- 2.5 JCS Policy SD12: Affordable Housing outlines the following thresholds for affordable housing delivery, as set out in Figure 1, below:

Figure 1- JCS Affordable Housing Thresholds

JCS LA Area:	9 dwellings or less:	10 dwellings or more:
<b>CBC</b>	0%	Minimum 40% on-site
<b>GCC</b>	0%	Minimum 20% on-site
<b>TBC</b>	<a href="#">40% affordable housing on-site</a> (in designated rural areas)	Minimum 40% on-site
<b>Strategic Allocation Sites</b>	0%	Minimum 35% on-site

- 2.6 The JCS authorities recognise that significant land value variations across the JCS area may result in affordable housing provision exceeding normal policy requirements. Housing Enabling officers will work with Homes England and applicants to explore additionality on a site-by-site basis as supported by SD12.

### The Strategic & Local Plan (SLP):

- 2.7 The Cheltenham, Gloucester, and Tewkesbury Strategic & Local Plan (SLP) will replace the JCS, establishing the overarching cross-boundary planning strategic policies covering the whole area, including local policies for each local authority. A detailed adoption timeline can be found on the [SLP website](#).

## Section 3: Evidence Bases Supporting Policy Making

- 3.1 Several evidence bases underpin JCS and Local Plan policies and support officers in determining policy-compliant affordable housing provision.

### The Local Housing Needs Assessment (LHNA) and Local Authority Housing Registers:

- 3.2 With regards to meeting housing needs, the [December 2024 NPPF](#) states that:
- 3.3 *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method.”*
- 3.4 The Local Housing Needs Assessment (LHNA) acts as a starting point to inform the affordable housing tenure mix, affordability and accessibility requirements required from new developments. The LHNA can be accessed [here](#):

- 3.5 The Housing Register indicates the current rented affordable housing need in each local authority area by priority need, as outlined within the [Homeseeker Plus policy](#).

## Section 4: Affordable Housing Need across the JCS Area:

### **JCS Policy SD11: Housing Mix and Standards:**

JCS Policy SD11: Housing Mix and Standards states that development should address local housing needs, as set out in the local housing evidence base, including the latest LHNA.

Schemes will be typically required to deliver the following tenure split:

- I. 75% of affordable housing provision should prioritise social rented delivery, to be determined on a site-by-site basis.
- II. 25% of affordable housing provision should be delivered as Affordable Home Ownership tenures.

### **Policy Guidance- Affordable Housing Mix:**

- i. Applicants must robustly justify any departure from the tenure split outlined above in writing.
- ii. Applicants should engage with Housing Enabling Officers to determine on-site Affordable Home Ownership requirements.
- iii. Housing Enabling Officers will use up-to-date information regarding local housing needs, past delivery, lettings data and stock profiles to inform affordable housing mixes.

- 4.1 When delivering rented homes, the JCS authorities will seek the most affordable rented tenure for tenants, taking account of total housing costs.
- 4.2 Specifically, the preference for delivering social rented homes is subject to an applicant demonstrating, in writing, the affordability of social rents, including the costs of service and likely estate management charges for residents.
- 4.3 This approach is supported by the latest NPPF, which emphasises the importance of planning for and delivering social rented homes to aid affordability and meet local housing need.
- 4.4 Further context surrounding the delivery of affordable home ownership tenures can be found in [Section 6, below](#).

- 4.5 The 2020 Gloucestershire LHNA concludes that the JCS authorities should collectively deliver 11,053 new affordable homes between 2021-41 to meet identified needs.
- 4.6 The latest housing register data (November 2025) records that 2,530 households were in (rented) housing need in Cheltenham Borough alone.
- 4.7 Therefore, the tenure split outlined above addresses both identified housing needs and elevated rented housing need arising across the JCS area, focusing upon delivering genuinely affordable rented homes for households in the greatest housing need.

**Policy Guidance- Delivering Rented Homes:**

- i. When considering proposals for rented affordable housing provision, the authorities will seek to prioritise the delivery of social rented housing, subject to paragraph 4.2, alongside Affordable Rent provision where appropriate to meet housing needs.

- 4.8 Social rented housing, (subject to the level of other charges) is sought in light of:
- i. Historical undersupply;
  - ii. Acute current need; and;
  - iii. Serious affordability issues across the JCS area.
  - iv. Explicit Government support through [Homes England's 2026-2036 Social and Affordable Homes Programme](#)
- 4.9 To illustrate historical undersupply, monitoring information shows that 209 social rented homes have been delivered in Cheltenham Borough from 1 April 2018 to 31 March 2025 compared to an identified need of 384 social rented homes over this period. In practice, this means that only 54% of identified need has been met over 6 financial years.
- 4.10 The latest 2020 Local Housing Need Assessment (LHNA), Figure 91, Page 155, identifies that 4,351 new social rented homes are required across the JCS area between 2021-2041, representing the majority of identified rented affordable housing need required over this period.
- 4.11 With regard to affordability, social rented homes are linked with local incomes and housing costs, therefore maximising affordability for local people with few housing alternatives. Homes England has classified the JCS authorities as ['high affordability pressure' areas](#), underlining the importance of delivering social rented homes to meet identified housing needs.
- 4.12 The affordability of four bedroom+ homes is critical to minimise affordability pressures on larger low-income households. Applicants should outline how the most affordable rented tenure is being provided to comply with JCS Policy SD11.
- 4.13 This approach is justified due to the current acute affordable housing need for larger rented accommodation, combined with low stock turnover and limited existing supply.

- 4.14 Affordable Rent is expected to be provided at Local Housing Allowance level with a maximum variance of 5%.
- 4.15 Market rents have surged over the past 5 years, presenting serious affordability challenges to Affordable Rented households. Accordingly, Affordable Rent provision must be robustly justified by applicants.

### Service Charges:

#### **Policy Background- Service Charges**

- i. **JCS Policy SD12: Affordable Housing:** Provision should be made, where possible, to ensure that housing will remain at an affordable price for future eligible households

#### **Policy Guidance- Service Charges:**

- 1 Service charges for rented and Affordable Home Ownership homes must be related to the provision of reasonable services (itemised, where feasible) and be set at reasonable levels, demonstrated in writing, to ensure that these homes remain affordable for low-income households.
- 2 No Service Charge will apply to the Affordable Housing Units unless all elements of the Service Charge are eligible for Local Housing Allowance or equivalent subsequent scheme
- 3 Applicants will be expected to quantify the information in (1) above within the Section 106 agreement.
- 4 Applicants should engage proactively with the JCS Housing Enabling Officers and Development Management Officers, ideally at pre-application stage, to minimise service charges through planning layout and housing design.

### Service Charges- Policy Justification:

- 4.16 Service charges should be set at reasonable levels given the nature of accommodation offered and on-site facilities available, to ensure that affordable homes remain affordable for low-income households.
- 4.17 Good design should be used to reduce service charges for tenants and Shared Owners alike, supporting tenancy sustainment and increasing the disposable income available to these households. Applicants should work with Housing Enabling Officers to agree layouts and design that minimise service charges.

- 4.18 Ensuring that service charges are covered by the Local Housing Allowance or subsequent equivalent scheme will ensure that these charges remain reasonable and affordable for affordable housing tenants and leaseholders in perpetuity- thereby meeting the policy requirements of JCS SD12.

#### Downsizing across the JCS area:

##### **Policy Guidance- downsizing across the JCS area:**

The JCS authorities' ambition is to create attractive accommodation options to promote downsizing from larger affordable housing stock.

- i. Applicants must account for downsizing needs within affordable housing proposals by including an appropriate proportion of smaller, accessible (M4(2) and M4(3)(2)(b) 1-bedroom affordable homes for downsizers.
- ii. In doing so, applicants should be mindful of adopted local plan policy requirements.

#### Downsizing- policy justification:

- 4.19 As of November 2025, Cheltenham Borough's Housing Register alone has 35 households recorded in Emergency Band (households who are prioritised for lets on the basis that they are downsizing from larger affordable accommodation), and 26 households in Gold band seeking to downsize.
- 4.20 Further data analysis reveals that 78% of 4 bedroom households (80 households) and 87% of 5 bedroom households (20 households) on Cheltenham's Housing Register alone are in a reasonable preference band, indicating a chronic need to release larger sized rented affordable accommodation.
- 4.21 Whilst the three Councils have differing local housing needs for both smaller and larger affordable housetypes, providing suitable downsizing options on new developments would help to improve stock turnover for larger affordable households in desperate need of rented accommodation.

## Section 5: The Role of Affordable Home Ownership

### National Affordable Home Ownership Policy:

- 5.1 The latest [NPPF](#) details the role of affordable home ownership on major developments, with the glossary outlining affordable home ownership tenures that qualify as 'affordable housing' for planning purposes.

### JCS Affordable Home Ownership Approach:

**Policy Guidance: delivering affordable home ownership:**

- i. Affordable Home Ownership provision will be determined by agreement on a site-by-site basis, which can include First Homes and/or Shared Ownership.
- ii. The JCS authorities' strong preference is to deliver Shared Ownership on new developments.
- iii. Alternative affordable home ownership tenures will be considered in accordance with the latest NPPF.
- iv. First Homes will be allocated to applicants with a local connection to the relevant JCS area(s).

**What are [First Homes](#)?**

- 5.2 First Homes are an affordable home ownership tenure, with homes being sold to first-time buyers at a minimum 30% discount against open market value. This discount is secured forever through a title restriction which is passed onto future First Homes purchasers.
- 5.3 First Homes were introduced in May 2021 through the [First Homes Written Ministerial Statement](#).

**[Affordable Home Ownership delivery- policy justification:](#)**

- 5.4 The JCS authorities' flexible approach to determining affordable home ownership provision takes into account specific site characteristics, the fledging market and mortgage availability for First Homes, and the central role of Shared Ownership in cross-subsidising affordable housing delivery.
- 5.5 However, the JCS authorities' preference will be to primarily deliver Shared Ownership on new developments, as Shared Ownership has lower deposit requirements and initial share requirements than First Homes, thereby being a more accessible product for lower income households.
- 5.6 The [First Homes Technical Advice Note](#) will clarify how First Homes requirements will be implemented in Cheltenham Borough.
- 5.7 To be clear, First Homes will not be sought by Tewkesbury and Gloucester on new developments.
- 5.8 In the event that First Homes are delivered, these will be allocated to applicants with a local connection to the relevant JCS authority area will ensure that local people benefit from this housing provision, thereby supporting job retention and economic growth across the JCS area.

- 5.9 Administrative responsibility for First Homes delivered on strategic allocation sites will fall to the local authority where the First Homes are located.

## Section 6: Affordable Housing Standards

### JCS Approach to Minimum Dwelling Sizes:

#### **Policy Background- JCS Approach to Minimum Dwelling Sizes:**

- i. **JCS Policy SD11:** New housing should meet, and where possible, exceed appropriate minimum space standards.
- i. **JCS Policy SD4:** Development should be designed to be adaptable to changing economic, social and environmental requirements.
- ii. **Gloucester Local Plan Policy F6:** Development proposals for new residential development...must meet Nationally Described Space Standards (or any future successor).
- iii. **Tewkesbury Local Plan Policy DES1:** Adopts the Government's Nationally Described Space Standards. All new residential development will be expected to meet these standards as a minimum. New residential development will be expected to make adequate provision for private outdoor amenity space appropriate to the size and potential occupancy of the dwellings proposed.

### Affordable Housing Space Standards- policy justification:

#### **Policy Guidance- approach to affordable housing minimum space standards:**

- i. Development proposals in Gloucester City and Tewkesbury Borough must comply with the space standard requirements outlined in Gloucester Local Plan Policy F6 and Tewkesbury Local Plan Policy DES1.
- ii. In Cheltenham Borough, applicants should benchmark affordable housing space standards against the [Partnership Design Standards](#).

- 6.1 Building affordable homes to appropriate space standards will provide affordable households with sufficient storage space and the ability to adapt to changing social requirements (e.g. home-working and growing children).
- 6.2 In Cheltenham Borough, the [JCS Precedent Guidance Note affordable housing sizes](#), (as agreed between the JCS authorities and the Preferred Providers) have been largely achieved for many years.
- 6.3 Affordable homes should seek to accommodate double bedrooms (e.g. 2 bedroom 4 person), to minimise overcrowding, support tenancy sustainment, and meet housing need. A table setting out expected occupation levels for affordable homes is set out below.

**Expected JCS Affordable Housing Occupation Levels:**

<b>Bedroom number</b>	<b>Expected Occupation Levels:</b>
1 bedroom	2 person
2 bedroom	4 person
3 bedroom	5 person, 6 person
4 bedroom	7 person, 8 person
5 bedroom	8 person, 10 person

**JCS Approach to Delivering Accessible Homes:**

**Policy Background- JCS Approach to delivering accessible homes:**

- i. **JCS Policy SD11: Housing Mix and Standards-** Development should address the needs of the local area...as set out in the local housing evidence base including the most up to date Strategic Housing Market Assessment
- ii. Housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies.
- iii. **JCS Policy SD4: Design Requirements-** New development should provide access for all potential users, including people with disabilities... to ensure the highest standards of inclusive design. Development should be adaptable to changing economic, social and environmental requirements.

**Policy Guidance- Delivering accessible homes:**

- i. To meet identified need for M4(2) homes, 67% of all new affordable homes should meet M4(2) standards, with the exception of policy requirements in Gloucester City, as set out in Gloucester City Plan A6.<sup>1</sup>
- ii. The JCS authorities will take a site-by-site approach to determining M4(3) affordable housing provision, considering the scheme context and local housing needs evidence base to inform proposals.
- iii. M4(3) affordable provision should meet the latest [M4\(3\)\(2\)\(b\) 'accessible' standard](#).<sup>1</sup>

**Policy Guidance- Delivering accessible homes (cont):**

- i. As a minimum, at least 50% of specialist housing for older people should meet M4(3) requirements; and all specialist older persons' housing should meet M4(2) Category 2 requirements.
- ii. Planning agreements should include clauses to enable adaptations to occur within the first 12 months of completion without impact on defects clauses.

6.4 Gloucester City Plan A6 outlines specific accessible housing policy requirements within Gloucester City. New developments will be expected to meet these policy requirements, instead of the policy evidence outlined above.

6.5 The [Government has confirmed its intention to mandate M4\(2\) standards](#) in all new-build homes (with minor exceptions). If implemented, this approach will significantly improve housing adaptability over time.

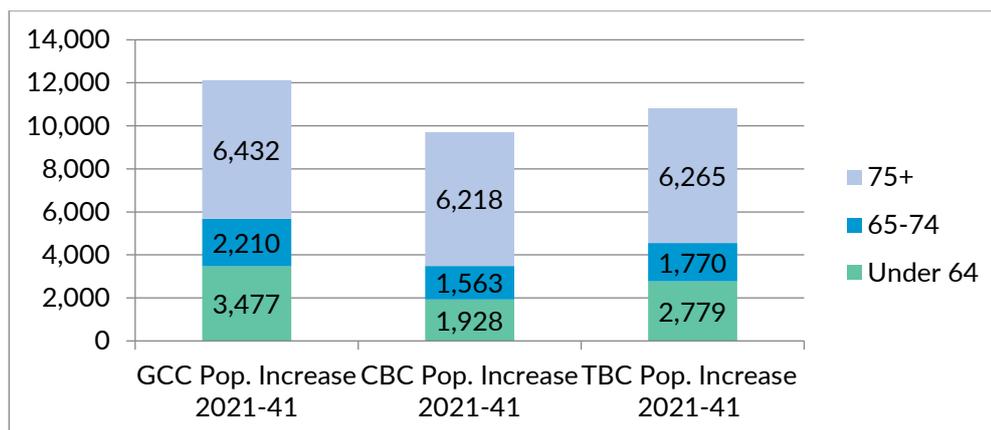
6.6 In 2021, the 2020 LHNA (Figure 77, page 119) identified that 1,131 JCS residents had a long-term limiting injury (LLTI) or disability, that needed to move to a more suitable home as shown below:

Figure 2: LLTI and Disability data by JCS Local Authority

JCS LA:	LLTI/Disability
Cheltenham BC	365
Gloucester CC	450
Tewkesbury BC	298
JCS Total:	1,105

6.7 Equally, the LHNA's household projections between 2021-2041 reflects a marked increase in the 65+ demographic across the JCS area, increasing the need for accessible homes to maintain independence.

Figure 3: LHNA Household Projection Population Increases- 2021-41



- 6.8 Figure 83, Page 126 of the 2020 LHNA specifies the M4(2) affordable housing need across the JCS area, covering both market and affordable tenures.
- i. Cheltenham Borough must deliver 7,215 M4(2) accessible and adaptable homes between 2021-41.
  - ii. Gloucester City must deliver 8,647 M4(2) homes between 2021-41.
  - iii. Tewkesbury Borough Council must deliver 6,397 M4(2) homes between 2021-41.
- 6.9 Collectively, 22,259 M4(2) affordable homes are required across the JCS area between 2021-41 to meet identified needs.
- 6.10 When delivering M4(2) affordable homes, the JCS authorities will concentrate upon providing rented accommodation for households in the greatest need.
- 6.11 The latest LHNA **identifies a target of 8% of all affordable homes to meet M4(3)- Wheelchair User Dwellings standards, as reflected below:**
- i. Cheltenham Borough - 213 affordable M4(3)(2)(b) wheelchair accessible homes between 2021-41.
  - ii. Gloucester City- 387 M4(3)(2)(b) affordable wheelchair accessible homes between 2021-41.
  - iii. Tewkesbury- 232 M4(3)(2)(b) affordable wheelchair accessible homes between 2021-41.
- 6.12 Enhancing unit sizes and providing the largest possible through-floor lifts can future-proof wheelchair accessible homes.
- 6.13 Applicants should integrate M4(2) and M4(3)(2)(b) homes into new developments to foster cohesive communities in line with [Gloucestershire County Council's Housing with Care Strategy](#).
- 6.14 Applicants should engage with registered providers at the earliest possible opportunity (namely, prior to the submission of a planning application) to discuss and allow adaptation either pre-completion as part of the initial lettings process or within the 12 months defects period.

- 6.15 Requirements to allow adaptations to be carried out on M4(2) and M4(3) affordable homes will be included with planning agreements.

## Section 7: Affordable Housing Design

### **Policy Background: JCS Policy SD12: Affordable Housing**

- i. The design of affordable housing should... be equal to that of market housing in terms of appearance, build quality and materials
- ii. Affordable housing ... should be seamlessly integrated and distributed throughout the development scheme.
- iii. Where a development site is divided into parts or is being delivered in phases the site will be considered as a whole when determining the appropriate affordable housing requirement.

### Affordable Housing Appearance, Distribution, Clustering and Phasing:

#### **Policy Guidance: Affordable Housing Appearance, Distribution, Clustering and Phasing**

- i. Affordable housing must be located fairly in terms of access and proximity to on-site community facilities and amenities.
- ii. Where market homes exceed policy expectations in terms of sustainability features, affordable homes should benefit from equivalent provision.
- iii. Applicants should work with Housing Enabling officers to determine appropriate affordable housing clustering and distribution on a site-by-site basis, using the JCS Clustering Strategy as a benchmark.
- iv. Whilst being site-specific, clusters of 6-12 affordable homes dispersed seamlessly and evenly throughout the development scheme will be generally acceptable.
- v. Affordable housing delivery timelines on phased developments should be commensurate with market provision.
- vi. The JCS authorities will agree phasing plans that deliver policy compliant affordable provision on all phases.

- 7.1 JCS Policy SD12 aims to integrate housing of all tenures to enable residents to be part of an inclusive and supportive community.
- 7.2 Creating 'tenure blind' developments enhances community cohesion. Whilst variety in external and internal design is encouraged, this should be reflected across all tenures.
- 7.3 JCS authorities will scrutinise the location, design, build quality, pallet, materials, and amenities of the affordable homes against their market counterparts to achieve equivalent standards across all tenures.
- 7.4 The JCS authorities will also review garden sizes, garden boundary materials, specification of ironmongery amongst other matters to ensure that policy compliance is achieved.
- 7.5 The JCS Clustering Strategy has been formulated through extensive consultation with the Preferred Providers and reflects the shared desire to foster cohesive communities that minimise disadvantage and enable residents to thrive.
- 7.6 To this end, occupation will be prevented for more than 50% and 90% of Open Market Units (on any phase) until 50% and 100% of the Affordable Housing Units (on that phase) have been completed and made available for occupation.
- 7.7 A list of required documentation accompanying planning applications can be found in [Appendix 4](#).

## Section 8: Specialist Accommodation

### **Policy Background: JCS Policy SD11- Housing Mix and Standards**

- i. Provision of specialist accommodation, including accommodation for older people, will be supported where there is evidence of a need for this type of accommodation and where the housing / bed spaces will contribute to meeting the needs of the local community;
- ii. Specialist accommodation should be located to have good access to local services. In the case of Extra Care housing schemes which provide ancillary facilities on site, these facilities should complement those already available in the locality and should be made available to the wider community;
- iii. Schemes that create self-contained accommodation units will be subject to the requirements of Policy SD12.

- 8.1 Specialist Accommodation includes a range of older persons accommodation that qualifies for an affordable housing contribution, as defined by the PPG/NPPF.

- 8.2 Applicants must engage with Gloucestershire County Council commissioners at the earliest possible opportunity when considering [specialist or supported housing schemes](#).
- 8.3 When delivering specialist accommodation, applicants should be mindful of the specific policies within the JCS authorities respective local plans, in particular, Gloucester City Plan Policy A5: Specialist Accommodation and GCP Policy A6: Accessible Housing.

### Need for Specialist Accommodation across the JCS Area:

- 8.4 [2021 Census population data](#) indicates that 22,800 people in Cheltenham were 65+. By comparison, in 2011, [19,329 residents were 65+](#).
- 8.5 The latest [LHNA](#) (Figure 68, page 107) indicates that an additional 24,459 older households (aged 65+) will live in the JCS area by 2041. Accordingly, the population of 65+ residents is projected to increase by 47% over the next 20 years.
- 8.6 It is reasonable to assume that not all of these people will need, or want, to live in affordable specialist accommodation.

### Delivering Specialist Accommodation:

- 8.7 Increasing the provision of adaptable and accessible housing within the general affordable housing stock is likely to reduce the need for specialist accommodation.

#### **Policy Background: JCS Policy SD4: Design Requirements**

- i. New development should provide access for all potential users, including people with disabilities, to buildings, spaces and the transport network, to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements.

#### **Policy Guidance: Specialist Accommodation**

- i. Specialist accommodation proposals should be supported by Gloucestershire County Council commissioners and Housing Enabling officers.
- ii. The design of specialist accommodation must demonstrably meet the needs of the specialist group for whom it is intended.
- iii. The JCS authorities favour a 'hub-and-spoke' model as an integral part of new specialist accommodation schemes to promote intergenerational interactions between communities.

## Extra Care Housing:

- 8.8 Whilst Extra Care schemes can support ageing, frail or disabled households by providing a range of care options for residents with differing levels of care needs, proposal should be reflective of the latest evidence of locally arising housing need.
- 8.9 The JCS authorities will work closely with GCC commissioners to gauge need for Extra Care schemes which may include mixed tenure schemes including social rented and/or Shared Ownership homes.
- 8.10 Where Extra Care schemes are sought, applicants are encouraged to adopt a hub-and-spoke model to encourage intergenerational interaction between the schemes' residents and the wider community.
- 8.11 Extra Care schemes with an affordable housing contribution will be expected to deliver higher accessibility requirements, [as set out within Section 6](#), to reflect resident's needs.

## Section 9: Assessing Financial Viability

### Where may viability assessments be relevant?

#### **Policy Background: JCS Policy SD12: Affordable Housing**

- i. If a development cannot deliver the full affordable housing requirement, a viability assessment, conforming to an agreed methodology, in accordance with Policy INF7 will be required.
- ii. Where there are viability issues that impact on delivering the full affordable housing requirement, developers should consider:
- iii. Varying the housing mix and scheme design to reduce costs whilst having regard to the requirements of other plan policies, particularly Policy SD4, and the objective of creating a balanced housing market;
- iv. Securing public subsidy or other commuted sums to assist affordable housing delivery

#### **Policy Guidance: Assessing Financial Viability:**

- i. Where viability is identified as an issue, applicants must comprehensively review scheme proposals with the objective of achieving policy-compliant schemes.
- ii. Applicants will be required to submit a open-book viability assessment to justify any reduction in on-site affordable housing delivery. This

assessment will be independently scrutinised by the JCS authorities' respective valuers.

- iii. Viability assessments and subsequent independent viability reviews seeking to reduce affordable housing provision will be paid for, in full, at the applicants expense.
- iv. Applicants should work with RP partners to secure Homes England grant funding following independent viability evidence concluding that the scheme is unviable. If this approach is unsuccessful, the JCS Local Authorities will consider off-site provision and/or commuted sums.

- 9.1 The supporting text to JCS Policy SD12 contains further details relating to the resolution of viability issues.
- 9.2 Where an affordable housing obligation is triggered, JCS Policy SD12 secures on-site, policy compliant affordable housing delivery. In exceptional circumstances, off-site provision (or commuted sums) must be robustly justified in writing.
- 9.3 In exceptional circumstances, off-site delivery will be considered by the JCS authorities on a site-by-site basis, with applicants expected to robustly demonstrate any of the following site characteristics to justify off-site provision (please note, these characteristics are not exhaustive):
  - i. Schemes that include listed buildings, where delivering alternative affordable housing provision on site is unfeasible.
  - ii. Community cohesion considerations on small developments.

#### Rounding fractions through affordable housing delivery:

- 9.4 Where policy compliant affordable housing delivery falls short of a whole number, appropriate provision will be determined as follows:
  - i. Where policy compliant affordable housing provision results in 0.5 (or greater) of a whole number being required, the JCS authorities will round up to the next whole number.
  - ii. Where policy compliant affordable housing provision results in less than 0.5 of a dwelling being required, contributions will be rounded down to the nearest whole number.

#### Determining Commuted Sums:

- 9.5 The latest local authority affordable housing proposal will inform the commuted sum requirement.
- 9.6 The commuted sum formula is: 'the sum (A) that is the difference between the open market value of xxx bedroom apartment/ house (B) (on said plot of land) and the value of a xxx bedroom affordable rented unit (C).'

- 9.7 All commuted sum requirement disputes will be referred to the Independent District Valuer for final determination. [Appendix 7](#) includes further details regarding spending commuted sums.

## Section 10: The JCS Affordable Housing Partnership

- 10.1 The JCS Affordable Housing Partnership (AHP) is comprised of Housing Enabling Officers from the JCS Councils and RPs; known as the [Preferred Providers](#). The JCS AHP only applies to the JCS Strategic Allocation Sites.
- 10.2 The Partnership's high-level objectives are threefold:
- i. To maximise new affordable housing delivery and to ensure the unmet affordable housing needs of Cheltenham and Gloucester are supported by the Strategic Allocations.
  - ii. To create a framework that enables new communities to become and remain cohesive and sustainable; and
  - iii. To support the Councils in reducing homelessness.

### The assurances offered by the Preferred Providers:

- 10.3 The JCS Authorities have selected [Preferred Providers](#) to acquire and manage affordable homes developed on the Strategic Allocation Sites to a high standard, whilst supporting community resilience by working with key stakeholders.
- 10.4 Applicants will be expected to make reasonable endeavours to partner with Preferred Providers on the JCS Strategic Allocations.
- 10.5 The [JCS Precedent S.106 Guidance Note](#) has been produced in consultation with the Preferred Providers to benchmark affordable housing proposals on Strategic Allocations.

## Section 11: Cheltenham Borough Council Local Plan

- 11.1 The adopted [Cheltenham Borough Council Local Plan](#) includes relevant affordable housing policy considerations beyond adopted JCS policies.

### **Policy Background- Cheltenham Plan Policy HM2: Elderly Care Provision**

- i. Housing choice for older people and supported and special needs housing proposals for older people, should focus on providing high-specification care-ready accommodation.
- ii. The Council will support proposals that:
  - a) Help to meet an identified need.
  - b) Demonstrate that they would not have a harmful impact on the character and amenities of the surrounding area.

- c) Are accessible to local shops and easily accessible by public transport.
- iii. Schemes should demonstrate adequate external amenity space to provide a high-quality and safe external living environment for residents, including areas for sitting, socialising, gardening and active leisure pursuits.
- iv. Proposals for specialist elderly care, including dementia care accommodation, should provide adequate communal facilities, including accommodation for essential staff on site, and should reflect current best practice in specialist accommodation design.

11.1 In terms of best practice in specialist accommodation design, applicants should have due consideration to guidance from [Kirklees Council](#) and the [University of Stirling](#), amongst others. Additionally, [Housing Lin](#) has a range of resources which can help to inform good practice in older persons' design, including [best-practice relating to Extra Care accommodation](#).

**Policy Guidance: Cheltenham Plan Policy HM2- Elderly Care Provision**

- i. Applicants should read the [Council's Housing, Homelessness and Rough Sleeping Strategy 2023-2028](#), which supports the Cheltenham Plan, focusing upon achieving a step-change in affordable housing delivery, preventing homelessness and creating resilient communities.

**Policy Guidance: Dementia-friendly design**

- ii. Specialist dementia accommodation should include the following design characteristics:
- iii. Site Location; near key amenities, preferably in a quiet location
- iv. A central hub with shared facilities (open to the general public) will be encouraged.
- v. Clear internal and external navigation and passageways.
- vi. Appearance should be reflective of residential development to aid community integration and cohesion.
- vii. Utilisation of natural light should be optimised, with accommodation overlooking landscaped garden areas.

## Section 12: Gloucester City Council Local Plan<sup>1</sup>

- 12.1 The [Gloucester City Plan to 2031](#) contains key policies relating to housing provision, which is supported by the JCS AHGN. Both documents should be read in conjunction and developers should follow detailed Gloucester City Plan provisions.

The following Gloucester City Plan policies should be given careful consideration when formulating planning applications:

- i. Policy A1- Efficient and Effective Use of Land and Buildings
- ii. Policy A5- Specialist Housing
- iii. Policy A6- Accessible and Adaptable Housing
- iv. Policy A7- Self-Build and Custom Build Homes
- v. Policy C1- Active Design and Accessibility
- vi. Policy C3- Public Open Space, Playing Fields, and Sports Facilities
- vii. Policy C5- Air Quality
- viii. Policy C7- Fall Prevention from Taller Buildings
- ix. Policy F6 -Nationally Described Space Standards

- 12.2 Applicants should familiarise themselves with a number of policies that were developed subsequent to the JCS and have been adopted with the City Plan. These policies build on the strategic policies, SD11 and SD4.
- 12.3 In relation to affordable housing considerations, Policies A1, A6, A7 and F6 are pertinent to all proposed housing with A5 being relevant to specialist housing development. Applicants should comply with all Gloucester City policies to improve both the quality and quantum of housing delivery.

## Section 13: Tewkesbury Borough Council Local Plan

- 13.1 The [Tewkesbury Local Plan to 2031](#) contains key affordable housing policies that should be read in conjunction with the AHGN.

### **Policy RES12 Affordable housing:**

- i. Residential developments in Designated Rural Areas that provide a net increase of 6 – 9 dwellings will be required to provide 40% affordable housing on-site.
- ii. Outside of JCS Strategic Allocation sites, developments of 10 or more dwellings or sites with an area of 0.5 hectares or more should provide 40% affordable housing on site.
- iii. The calculated requirements above will be rounded to the nearest whole unit.

<sup>1</sup> <https://www.gloucester.gov.uk/media/ynedezpg/gloucester-city-plan-low-res.pdf>

iv. Shared strategic allocations should comply with JCS Policy SD12

**Policy RES13 Housing Mix:**

- i. Accessible and adaptable dwellings (Regulation M4(2) Category 2) and wheelchair user dwellings (Regulation M4(3) Category 3) should be provided on new developments in accordance with up-to-date evidence of local need.

- 13.2 The size, type and tenures of housing should meet local need. Housing mix will be considered during the planning process on a site-by-site basis with due consideration to local factors and the specific site context.
- 13.3 New developments should ensure appropriate provision of accessible and adaptable dwellings. Given the significant growth in the older population, and the higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist accommodation options moving forward.
- 13.4 Officers will seek to deliver M4(3)(2)(b) wheelchair accessible affordable homes to ensure that homes require minimal adaptations prior to housing wheelchair users.

**Policy RES14 Specialist accommodation for older people:**

- i. Proposals for specialist accommodation for older people to meet identified needs will be supported subject to policy considerations under RES14.

- 13.5 Within the JCS area, TBC records the largest proportion of older person only households (households aged 65 or over) at 24.9% (SHMA update note 2015). This is compared to 21.3% in the JCS area and 20.5% nationally. Reflecting national trends, the older population within the JCS area is expected to increase dramatically over time, with household reference persons over 85 expected to grow by over 75% by 2031.

**Policy RES6 Rural Exception Sites:**

Policy RES6 makes provision for Rural Exception Sites in TBC. Rural Exception Sites must meet local needs and are subject to the requirements of the Plan.

## Section 14: Appendices

### Appendix 1: Glossary

**Additionality:** Refers to affordable housing delivered above and beyond the social housing provision that would normally be provided through market delivery alone.

**Affordable Home Ownership (AHO):** is intermediate affordable housing designed to help people who wish to buy their own home but cannot afford to buy outright without subsidy.

**Affordable Housing:** Please refer to the Government's [affordable housing definition](#).

**Affordable Rent:** Refers to affordable housing that is set in accordance with the Government's policy for Affordable Rent, or is at least 20% below local market rents, (including service charges).

**Clustering:** Refers to small groups of affordable housing to be evenly and seamlessly distributed across and throughout development schemes to promote mixed and balanced communities.

**Extra Care:** Is defined as purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents can live independently with 24-hour access to support services and staff. There are often extensive communal areas, including space to socialise and wellbeing centres.<sup>2</sup>

**First Homes:** Refers to an affordable home ownership scheme designed to help first-time buyers onto the property ladder, by offering homes at a 30% minimum discount against open market value. Discounts remain in perpetuity, meaning that the local community will benefit from subsequent resales.

**Homeseeker Plus Policy:** The Homeseeker Plus Policy outlines the process for allocating rented affordable housing to households based upon their priority need banding and local connection.

**Homes England:** The Government's housing accelerator, improving neighbourhoods, and growing communities. Homes England are responsible for increasing new-build housing delivery across England.

**Joint Core Strategy (JCS):** The JCS sets out a strategic planning framework for the JCS area plan covering the administrative areas of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council together with strategic policies up to 2031.

**Local Connection:** A person has a local connection to the local authority area if, they have, or in the past were, normally a resident there, and the residence was of their own choice, or because a person is employed there or because a person has family associations to the district or owing to other special circumstances.

**Local Housing Needs Assessment (LHNA):** Identifies the minimum local housing need for the local planning authority areas using the Government's Standard Method.

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<sup>2</sup> 2020 LHNA, p. 109.

**M4(2) Category 2:** is an accessible housing classification included within the Building Regulations Approved Document M (2015), which broadly replicates the previous Lifetime Homes standard.

**M4(3)(2)(b) Wheelchair Accessible Homes:** Refers to building regulations Approved Document M (2015). Category 3b dwellings relate to the optional requirements for new developments to deliver Category 3 dwellings, which are equivalent to the wheelchair accessible standard, subject to the Council specifying which units are wheelchair accessible within a condition attached to the planning permission.

**Nationally Described Space Standards (NDSS):** The Government's optional technical space standards dealing with internal space within all new dwellings. The NDSS determines the gross internal area of new dwellings, including storage, bedrooms, and floor to ceiling height.

**Nominations Agreement:** An agreement between the Council and a Registered Provider which secures access to new-build affordable housing for Housing Register applicants.

**Planning Practice Guidance (PPG):** Is Government guidance that explains how the NPPF should be implemented in practice.

**Preferred Providers:** Are defined as Registered Providers who have been selected by the JCS authorities as preferred partners to deliver, manage, and maintain affordable housing on the JCS Strategic Allocation Sites to a high standard.

**Registered Providers:** as defined by Section 80 of the [Housing and Regeneration Act 2008](#)

**Section 106 Agreement:** A legal document under Section 106 of the Town and Country Planning Act 1990 binding applicants and the Council into carrying out specific works or essential monetary payments to allow the development to proceed.

**Shared Ownership:** Is a Government scheme which allows buyers to buy an equity share in their home, while paying a rent on the remaining equity (charged at a maximum of 2.75% of unsold equity). Shared Ownership also allows staircasing, where buyers can purchase additional shares in their home until full ownership is achieved.

**Social Rent:** Social Rented housing is affordable housing owned by local authorities and Registered Providers, where target rents are determined through the national rent regime.

**Specialist Accommodation:** Refers to a range of accommodation options for households with specialist housing needs. Housing options differ depending upon residents' independence, care, and housing needs.

**Specialist Housing for Older People:** Is defined within the [Planning Practice Guidance \(PPG\) on Housing for Older People, Paragraph 010](#).

**Strategic Allocations:** Are large-scale allocated developments on the edge of existing urban areas surrounding Cheltenham, Tewkesbury and Gloucester that will contribute to meeting strategic housing, employment, and economic needs.

**Tenure Blind:** means that both affordable and market homes of all tenures should be physically indistinguishable, covering the external physical

appearance of a dwelling, in addition to parking provision, landscaping and other common external features.

**Viability:** Ensures that planning policies are realistic, and that their cumulative cost does not undermine deliverability of the plan, taking a variety of factors into account.

## Appendix 2: Affordable Housing and NPPF

- 15.1 The [NPPF](#) confirms that affordable housing is a material consideration when preparing plans and determining planning applications.<sup>3</sup> Affordable housing should only be provided on major developments, other than in designated rural areas.
- 15.2 The NPPF sections relevant to affordable housing provision include:
- i. Supporting strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet present and future needs.
  - ii. Strategic policies should be informed by a Local Housing Needs Assessment (LHNA) to meet the minimum number of homes needed.
  - iii. Housing sizes, types and tenures needed for different groups in the community should be assessed and reflected in planning policies (including those requiring affordable housing)
  - iv. Where an affordable housing need is identified, planning policies should specify the affordable housing tenures required, and expect it to be met-on-site.

## Appendix 3- Precedent Section 106 principles

### Transferring Affordable Homes:

- 16.1 Affordable dwellings must be transferred to a RP (preferably a Preferred Provider) before market dwellings are fully occupied.

### Local Connection to the LA Area:

- 16.2 Local connection clauses ensure that affordable homes are allocated to local households in the greatest priority need, as per Homeseeker Plus policy.

### Nominations Agreements:

- 16.3 The JCS authorities expect 100% nomination rights on first lets and 75% nomination rights on all subsequent lets, with the exception of schemes delivering additionality.
- 16.4 All M4(2) and M4(3) affordable homes will be secured with 100% nomination rights on all subsequent lets of through Homeseeker Plus, to ensure these properties are allocated to households with specific accessibility needs.

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<sup>3</sup> NPPF Para 20.

### Design, Mix and Tenure:

- 16.5 The Precedent S.106 agreement specifies the key characteristics of the affordable housing scheme as agreed between the applicant and LA.

## Appendix 4: Affordable Housing Documentation

### Expectations:

#### Pre-application discussions:

- 17.1 Applicants should engage in pre-application discussions to create high-quality schemes, cohesive communities, and sustainable living spaces for all residents. JCS authority pre-application processes can be found below:
- i. Cheltenham Borough Council: <https://www.cheltenham.gov.uk/planning-guide>
  - ii. Tewkesbury Borough Council: <https://www.tewkesbury.gov.uk/planning-advice-service>
  - iii. Gloucester City Council: <https://www.gloucester.gov.uk/planning-development/planning-applications/pre-application-advice/>

#### Outline planning applications:

- 17.2 Applicants should, where possible, detail the affordable housing proposal by indicating the affordable housing locations, house types, tenures, unit sizes, occupancy levels and accessibility standards, as well as including an affordable housing schedule within an accompanying Section 106 agreement.

#### Reserved Matters and Full planning applications:

- 17.3 Reserved matters applications should include detailed planning layouts clearly defining the affordable housing scheme, specifying the floorplans, design, tenure, house types, sizes (in M<sup>2</sup>), occupancy levels and accessibility standards, in addition to allocating parking spaces and waste storage on a site plan.

## Appendix 5: Spending Commuted Sums:

- 18.1 All commuted sums will be index-linked using the [RICS All-in Tender Price Index published by the Building Cost Information Service](#) and secured within the latest [Precedent S.106 agreement](#).
- 18.2 The JCS authorities will require a minimum of 10 years from receiving commuted sum payments to spend or commit commuted sum monies. Longer periods will be considered on a case-by-case basis.
- 18.3 Commuted sums will be used towards the refurbishment or development of affordable housing stock, purchase of land and/or dwellings or such other housing related matters within the Council's administrative area.

### Commuted Sum Payments:

- 18.4 Receiving commuted sum payments at the earliest possible opportunity will be prioritised. Late commuted sum payments will accrue interest until payment is received, which will be treated as part of the commuted sum contribution.
- 18.5 S.106 agreements will include clauses to prevent market occupation prior to the full commuted sum payment being completed or alternative affordable housing land being transferred to an RP or LPA.

## Appendix 6: JCS Local Authority Contact Details

### Cheltenham Borough Council Key Contacts:

#### Housing Enabling Contacts:

[housingenabling@cheltenham.gov.uk](mailto:housingenabling@cheltenham.gov.uk)

#### Planning Policy Contacts:

[Planning.Policy@cheltenham.gov.uk](mailto:Planning.Policy@cheltenham.gov.uk)

#### Development Management Contacts:

[planning@cheltenham.gov.uk](mailto:planning@cheltenham.gov.uk)

### Gloucester City Council Key Contacts:

#### Housing Enabling Contacts:

[HPST@gloucester.gov.uk](mailto:HPST@gloucester.gov.uk)

#### Planning Policy Contacts:

[cityplan@gloucester.gov.uk](mailto:cityplan@gloucester.gov.uk)

#### Development Management Contacts:

[Development.Control@gloucester.gov.uk](mailto:Development.Control@gloucester.gov.uk)

### Tewkesbury Borough Council Key Contacts:

#### Housing Enabling Contacts:

[housingstrategy@tewkesbury.gov.uk](mailto:housingstrategy@tewkesbury.gov.uk)

#### Planning Policy Contacts:

[planningpolicyenquiries@tewkesbury.gov.uk](mailto:planningpolicyenquiries@tewkesbury.gov.uk)

#### Development Management Contacts:

[development.applications@tewkesbury.gov.uk](mailto:development.applications@tewkesbury.gov.uk)