

## Part B – Please use a separate sheet for each representation

Name or Organisation:

Home Builders Federation (HBF)

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

### **Core Policy CP9 - Affordable housing**

On sites of 10 or more dwellings provision of at least 30% affordable housing will be required. Within the Cotswolds Area of Outstanding Natural Beauty (AONB) or the designated rural parishes of Alderley, Alkington, Amberley, Arlingham, Bisley with Lypiatt, Brookthorpe with Whaddon, Coaley, Cranham, Eastington, Frampton on Severn, Fretherne with Saul, Frocester, Ham & Stone, Hamfallow, Harescombe, Haresfield, Hillesley & Tresham, Hinton, Horsley, Kingswood, Longney & Epney, Miserden, Moreton Valance, North Nibley, Nymphsfield, Painswick, Pitchcombe, Slimbridge, Standish, Stinchcombe, Uley and Whitminster, on sites of 4 or more dwellings at least 30% affordable housing provision will be required.

Policy requirements should be unambiguous. The prefix “at least” is unclear. The Council’s viability assessment shows that affordable housing provision above 30% is not viable. Brownfield sites in the Rural West of the District and the Stroud Valleys including Sharpness are unviable, the two larger greenfield typologies on the Gloucester Fringe are only marginally viable and all except one Strategic Sites are either unviable or marginally viable (also see HBF representations under Deliverability & Viability).

Furthermore, the requirement for provision of at least 30% affordable housing on-site on smaller sites of 4 or more dwellings in Cotswold AONB and other Designated Rural Areas may be impractical. The Council’s policy approach should be more flexible so that where appropriate commuted sums for off-site provision is also acceptable.

Under **Core Policy CP9**, the Council will negotiate the tenure, size and type of affordable units on site by site basis having regard to housing needs, site specifics and other factors. The Gloucestershire LHNA 2019 indicated that most need for affordable housing is for affordable or social rented dwellings. However, the Council’s final viability assessment appraisals are based on an affordable housing tenure split of 50% affordable rent and 50% affordable home ownership. This tenure mix should be reflected in site by site negotiations between the Council and developers. The Council’s affordable housing tenure mix should also accord with national policy. The 2019 NPPF expects at least 10% of homes to be available for affordable home ownership (para 64). The Written Ministerial Statement dated 24 May 2021 also requires 25% of affordable housing to be First Homes with further detail on implementation provided in the latest NPPG.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Council’s viability assessment shows that affordable housing provision above 30% is not viable. The prefix “at least” should be deleted.

The Council’s policy approach should be more flexible so that where appropriate commuted sums for off-site provision is also acceptable.

The Council’s site by site negotiations on the tenure, size and type of affordable units should have regard to housing needs, site specifics, viability and other factors.

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. The HBF wish to attend the Stroud LPR Examination Hearing Sessions to discuss the above representations in greater detail.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

21/7/21