

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	<input type="text"/>	Policy	CP2, CP3, DHC1, HC1, DHC2 & CP15	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is :

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

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.

Housing Land Supply (HLS)

The LPR's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver a housing requirement, which meets the District's LHN and assists in meeting unmet housing needs from Gloucester. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve HDT performance measurements.

Core Policy CP2 - Strategic Growth & Development Locations proposes strategic development site allocations for circa 7,680 dwellings at the following locations :-

- Cam North West for 900 dwellings ;
- Cam North East Extension for 180 dwellings ;
- South of Hardwicke for 1,350 dwellings ;
- Hunts Grove Extension for 750 dwellings ;
- Sharpness Docks for 300 dwellings ;
- Sharpness for 2,400 dwellings (5,000 dwellings by 2050) ;
- Stonehouse North West for 700 dwellings ; and
- Wisloe for 1,500 dwellings.

Local development site allocations for circa 985 dwellings are proposed in Berkeley, Brimscombe & Thrupp, Dursley, Frampton-upon-Severn, Hardwicke, Kingswood, Leonard Stanley, Minchinhampton, Nailsworth, Newtown & Sharpness, Painswick, Stonehouse, Stroud and Whitminster. These local development site allocations are distributed across the district as follows :-

- 525 dwellings in the Stroud Valleys (PS01, PS02, PS05, PS06, PS10, PS11, PS12, STRO65) ;
- 50 dwellings in the Stonehouse Cluster (PS16, PS42, PS17) ;
- 10 dwellings in Cam & Dursley (PS28) ;
- 10 dwellings in the Gloucester Fringe (HAR017) ;
- 240 dwellings in the Berkeley Cluster (PS33, BER016/17, PS35) ;
- 80 dwellings in the Severn Valley (PS44, PS45, PS46) ;
- 50 dwellings in the Wolton Cluster (PS38) ; and
- 20 dwellings in the Cotswold Cluster (PS41).
- 985 dwellings in total.

In addition to allocated sites, development will take place in accordance with the **Core Policy CP3 - Settlement Hierarchy**. The proposed settlement hierarchy comprises :-

- Tier 1 - Main settlements of Cam & Dursley, Stonehouse and Stroud ;
- Tier 2 - Local Service Centres of Berkeley, Minchinhampton, Nailsworth, Painswick, Wotton Under Edge and Hunts Grove ;
- Tier 3a - Accessible Settlements with Local Facilities of Hardwicke, Chalford, Manor Village (Bussage), Brimscombe & Thrupp, Eastington, Kings Stanley, Leonard Stanley, Frampton on Severn, Newtown & Sharpness, Kingswood, Whitminster and North Woodchester ;
- Tier 3b – Settlements with Local Facilities of Whiteshill & Ruscombe, Upton St Leonards, Uley, Slimbridge, Bisley, Coaley, North Nibley, Oakridge Lynch, Amberley, Horsley and Miserden ;
- Tier 4a - Accessible Settlements with Basic Facilities of “Old” Bussage, Cambridge, Eastcombe, Newport, Nymphsfield, Selsley and South Woodchester ; and

- Tier 4b – Settlements with Basic Facilities of Arlingham, Box, Brookthorpe, Cranham, France Lynch, Haresfield, Hillesley, Longney, Middleyard, Randwick, Saul, Sheepscombe, Stinchcombe and Stone.

All settlements identified in this Policy have defined settlement boundaries or “Settlement Development Limits” (SDL), within and (exceptionally) adjacent to which suitable development may be permitted. SDLs should be drawn to encompass all proposed site allocations.

Housing development within SDLs and other limited housing development specifically allowed for by other policies in the LPR at locations outside of SDLs will be permitted in accordance with **Delivery Policy DHC1 - Meeting housing need within defined settlements** and the meeting of all nine specified criteria of **Delivery Policy HC1 - Detailed criteria for new housing developments**. In Tier 3b and Tier 4 settlements support for small housing schemes of up to 9 dwellings (not leading to a cumulative increase of more than 10% of the settlement’s housing stock) outside SDLs are subject to all five criteria set out in **Delivery Policy DHC2 - Sustainable rural communities**. The HBF note that the requirement to satisfy all criteria set out in **Delivery Policies DHC1, HC1 and DHC2** is very restrictive and less permissible than suggested by **Core Policies CP2 and CP3**. A more flexible policy approach should be applied if the Council is unable to demonstrate a 5 YHLS and / or failed HDT.

Very small settlements not mentioned in the settlement hierarchy will be treated as open countryside, where development will be restricted to that which contributes to diverse and sustainable farming enterprises, recreation, tourism, or involves the conversion of rural buildings and the provision of essential community facilities, in accordance with **Core Policy CP15 - A Quality Living & Working Countryside**.

The Council’s overall HLS to 2040 is estimated as 14,935 dwellings as set out in Table 2 – Housing Requirement to 2040. This HLS comprising of :-

- existing commitments (large & small sites with planning permission or under construction & sites with resolution to grant planning permission as at April 2019) less undeliverable sites of 4,595 dwellings ;
- LPR allocations of 9,065 dwellings ; and
- 1,275 dwellings from small sites allowance of 75 dwellings per annum over 17 years.

To 2040, there is a headroom of 2,335 dwellings (18.5%) between the overall HLS of 14,935 dwellings and the District’s LHN (excluding unmet needs from Gloucester) of 12,600 dwellings. The HBF always advocates as large a contingency as possible. There is no numerical formula to determine a contingency quantum but where the HLS is highly dependent upon one or relatively few large strategic sites and / or localities then greater numerical flexibility is necessary than if the HLS is more diversified.

Whilst the HBF have no comments on individual sites and our representations are submitted without prejudice to any comments made by other parties, it is critical that an accurate assessment of availability, suitability, deliverability, developability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by parties responsible for the delivery of housing on each individual site. In Stroud, there are delivery concerns about brownfield sites and Strategic Sites (also see HBF representations on Viability and Deliverability). Indeed, the Council's own Viability Assessment concludes that brownfield sites and Strategic Sites should only be included in the LPR where it is demonstrated that they are deliverable. Extreme caution should be applied in relying on brownfield sites in the early years of the LPR (for example in its 5 YHLS) and only counted on where there is confidence that sites will be forthcoming.

Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. On strategic development site allocations, there may be long lead in times for the commencement of on-site development and build up to optimum delivery rates. To ensure a continuous HLS in the short to medium term, these sites should be complimented by smaller non-strategic sites. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68a). For Stroud, 10% of the housing requirement is approximately 1,200 dwellings. From the Council's evidence, it is not obvious if this national policy requirement will be achieved.

The Council's small site allowance of 75 dwellings per annum should be robustly evidenced. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.

The 2019 NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). The Council's Housing Trajectory is not site-specific and shows only five-year tranches rather than year by year. This provides insufficient detail to check the realism of the Council's delivery assumptions, which may be overly optimistic. The Council has not provided the clear evidence necessary to satisfy the 2019 NPPF Glossary definition of deliverable. The insertion of a more

detailed housing trajectory would assist in the annual monitoring of housing delivery from individual strategic and non-strategic sites.

Furthermore, there is no 5 YHLS Statement. If the Council cannot demonstrate a 5 YHLS on adoption of the LPR and maintain a 5 YHLS throughout the plan period, the LPR should not be found sound.

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 Housing Trajectory is not site-specific and shows only five-year tranches rather than year by year. The Council has not provided the clear evidence necessary to satisfy the 2019 NPPF Glossary definition of deliverable. The insertion of a more detailed housing trajectory would assist in the annual monitoring of housing delivery from individual strategic and non-strategic sites.

There is no 5 YHLS Statement. The HBF note that the requirement to satisfy all criteria set out in **Delivery Policies DHC1, HC1 and DHC2** is very restrictive and less permissible than suggested by **Core Policies CP2 and CP3**. A more flexible policy approach should be applied if the Council is unable to demonstrate a 5 YHLS and / or failed HDT.

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:

[Redacted Signature]

Date:

21/7/21