

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
Gloucestershire
GL5 4UB

SENT BY E MAIL ONLY TO
local.plan@stroud.gov.uk

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Dear Sir / Madam

STROUD LOCAL PLAN REVIEW (LPR) – EMERGING STRATEGY CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. 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. We would like to submit the following responses to specific questions contained within the Council's consultation documentation.

A local need for housing

Question 2.3a. Do you agree with the ways in which the emerging Strategy intends to meet local housing need?

At least 638 dwellings per annum over 20 years

As set out in the 2018 National Planning Policy Framework (NPPF) the determination of the minimum number of homes needed should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In summary the standard methodology comprises (revised National Planning Practice Guidance (NPPG) ID 2a-004) :-

- Demographic baseline based on annual average household growth over a 10 year period ;
- Workplace-based median house price to median earnings ratio ;
- Adjustment factor = $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$;
- Local Housing Need = (1 + adjustment factor) x projected household growth.



Using this methodology based on the 2014 household projections and 2017 affordability ratio the Council's calculation of 638 dwellings per annum is mathematically correct. The Council is reminded that this is only the minimum starting point any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to the local housing need figure. The Government's objective of significantly boosting the supply of homes remains (para 59). It is important that housing need is not under-estimated.

A variety of brownfield and greenfield sites

As set out in the 2018 NPPF the strategic policies of the LPR should provide a clear strategy for bringing enough land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The LPR should identify a sufficient supply and mix of housing sites after taking into account availability, suitability and economic viability. The LPR should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2018 NPPF Glossary. The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The LPR should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74). Planning policies should support development that makes efficient use of land (para 122) and makes as much use as possible of previously developed or brownfield land (para 117). For the Council to maximize housing delivery the widest possible range of sites by size and market location is required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products.

A proportion of affordable housing on sites of 10 or more dwellings and 5 or more dwellings in Designated Rural Areas

The 2018 NPPF confirms that the level and type of affordable housing provision required should be set out together with any other necessary infrastructure however such policy requirements should not undermine the deliverability of the LPR (para 34). Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development. An updated viability assessment should be undertaken. The Harman Report highlighted that "*what ultimately*

matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development”.

Minimum dwelling sizes

If the Council wishes to adopt the Nationally Described Space Standard (NDSS) as a policy requirement then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. The NPPG sets out that *“Where a need for internal space standards is identified, Local Planning Authorities (LPA) should provide justification for requiring internal space policies. LPA should take account of the following areas need, viability and timing”* (ID: 56-020). The Council should consider the impacts on need, viability and timing before introducing the NDSS.

A mix of dwelling types

The 2018 NPPF sets out that housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). These housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (para 31). In its evidence the Council should recognise that market signals are important in determining the mix of housing needed. All households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people’s housing needs the focus should ensure that appropriate sites are allocated to meet the needs of specifically identified groups of households such as families, older people and self / custom build. The LPR should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations rather than setting a specific housing mix on individual sites.

Flexible accommodation to “lifetime home” standards

If the Council wishes to adopt the higher optional technical standards for accessible and adaptable homes as policy requirements then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). The WMS dated 25th March 2015 stated that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. In seeking to apply any higher accessible and adaptable standards to new dwellings the Council should comply with the criteria set out in the NPPG (ID 56-005 to 56-011). All new homes are built to Building Regulation Part M Category 1 standards which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches / sockets at accessible heights and

downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock (if built more than circa 10 years ago) and benefit less able-bodied occupants. If the Government had intended that evidence of an ageing population alone justified adoption of the higher Part M Category 2 and / or 3 optional standards then such standards would have been incorporated as mandatory in the Building Regulations which the Government has not done. It is incumbent on the Council to produce a local assessment evidencing the specific case for Stroud which justifies the inclusion of optional higher standards and the quantum thereof.

Self and custom build housing

Self and custom build housing should be supported for its potential additional contribution to housing supply. The allocation of sites for self and custom build housing is supported. The Council should also consider a rural exceptions policy approach for self and custom build housing.

A policy approach for a proportion of self / custom build serviced plots on housing sites of a certain size is not supported which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. If these plots are not developed by self / custom builders then undeveloped plots are effectively removed from the housing land supply (HLS) unless the Council provides a mechanism by which these plots may be developed by the original non self / custom builder in a timely manner. Before introducing such a policy approach the Council should also consider the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. There is the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on housing sites of a certain size should be fully justified and supported by evidence of need. As set out in the NPPG (ID 2a-021) the Council should fully assess the demand from people wishing to build their own homes by collating data from reliable local information (including the number of validated registrations on the Council's Self / Custom Build Registers). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on larger housing sites.

The emerging growth strategy

Question 4.2a. Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

As set out in the 2018 NPPF the LPR should include strategic policies which address the Council's identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set out an overall strategy for the pattern, scale and quality of development (para 20). The emerging strategy concentrates housing growth for 12,800 dwellings in the

main towns of Cam, Dursley, Stonehouse & Stroud and 2 new settlements at Sharpness & Wisloe. There is also modest growth at Berkeley, Minchinhampton, Nailsworth & Painswick and lesser growth at Brimscombe, King Stanley, Kingswood, Leonard Stanley, North Woodchester & Thrupp. It is important that the emerging growth strategy and proposed distribution of housing meets the housing needs of both urban and rural communities.

Question 4.2d. Do you support our approach to addressing Gloucester's housing needs?

The addressing of Gloucester's housing needs should be an integral part of the Stroud LPR. As set out in the 2018 NPPF the LPR should be positively prepared and provide a strategy which as a minimum seeks to meet local housing needs and is informed by agreements with other authorities so that unmet housing need from neighbouring areas is accommodated (para 35a). To fully meet the legal requirements of the Duty to Co-operate Stroud District Council should engage on a constructive, active and on-going basis with neighbouring authorities to maximise the effectiveness of plan making. The LPR should be prepared through joint working on cross boundary issues such as where housing needs cannot be wholly met within administrative areas of individual authorities. The meeting of unmet needs should be set out in a Statement of Common Ground (SoCG) signed by all respective authorities in accordance with the 2018 NPPF (paras 24, 26 & 27). If the LPR is to be deliverable over the plan period it should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (para 35c). One key outcome from co-operation between the authorities should be the meeting of housing needs in full. A key element of examination is ensuring that there is certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Plans are adopted.

Settlement hierarchy

Question 4.3b. Do you support the proposed approach to managing development at small Tier 4 and 5 settlements by including them within the hierarchy and defining Settlement Development Limits?

The settlement hierarchy should be reviewed.

Settlement development limits

Question 4.4a. Do you support the emerging Strategy's approach towards maintaining settlement development limits?

Settlement development limits should be reviewed to provide enough opportunities to meet identified housing needs in full.

Question 4.4c. Do you support the proposals to allow some limited development beyond settlement development limits?

The proposal to allow development beyond settlement development limits is supported which adds flexibility to the Council's housing land supply (HLS).

Background Studies

Question 6.1. Are there any other specific local studies that you believe are needed to inform the LPR?

The 2018 NPPF sets out that housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (para 31). The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including the need for affordable housing (paras 60 - 62). If the Council proposes to introduce any optional higher technical standards for housing then such policy requirements should be fully justified by supporting evidence in accordance with the NPPG. The cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development.

Conclusions

In conclusion it is hoped that these responses are helpful to the Council in informing the next stages of the Stroud LPR. If any further information or assistance is needed please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Planning Manager – Local Plans