

Local Plan Consultation
Forward Planning Team
Cotswold District Council
Council Offices
Trinity Road
Cirencester
GL7 1PX

20 March 2022

Dear Sir / Madam

COTSWOLD LOCAL PLAN PARTIAL UPDATE – ISSUES & OPTIONS 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. The following responses to specific questions in the Cotswold Local Plan Partial Update Issues & Options document have been submitted via the Council's online consultation portal.

Topic Paper - Responding to the Climate Crisis

Q7a: Should the Local Plan go above and beyond Building Regulations, which only seek to make development low carbon ready as opposed to Net Zero Carbon?

No.

Q7b: Please explain why?

The HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The HBF support the Government's approach but there are difficulties and risks to housing delivery, which include the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government changes to Part S of the Building Regulations for the installation of Electric Vehicle Charging Points in new homes. In autumn 2020, the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. In September 2021, the Future Homes Delivery Hub supported by involvement from Government was launched. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the



2025 Future Homes Standard. From June 2022, the 2021 Interim Uplift to Part L (Conservation of fuel and power) Regulations will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. From 2025, the Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.

Topic Paper - Accessibility of New Housing Development

Q7: If we apply these standards to new housing developments, it may mean that we are able to deliver less housing in Cotswold, or that housing development may be more concentrated in fewer locations with good access to facilities and services. Do you think this is appropriate or would another approach be preferable?

No (see answer to Q10 below).

Q8: What balance of priority would you give to providing sufficient new housing to meet the District's identified housing need vs. making sure new housing is delivered in accessible locations?

The HBF would give top priority (No. 1) to providing sufficient new housing to meet the District's identified housing need.

Q10: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

The Council should provide sufficient new housing to meet the District's Local Housing Need (LHN) identified as a minimum of 490 dwellings per annum based on the Government's standard methodology. The Council should not deliver less housing than its LHN unless under the Duty to Co-operate neighbouring Gloucestershire authorities have agreed to accommodate unmet housing needs. This agreement should be set out in a signed Statement of Common Ground.

The Council's proposed distribution of housing development should meet the housing needs of both urban and rural communities. As set out in the 2021 NPPF "*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services*" (para 79). The concentration of housing development in fewer locations with good access to facilities and services may not optimise housing delivery, a wider range of sites by both size and market location provides small, medium and large housebuilding companies with access to suitable land to offer the widest possible range of products. A more diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide 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 choice / competition in the land market.

Topic Paper - Biodiversity

Q1a: Should developments in Cotswold District achieve more than 10% biodiversity net gain (BNG)?

No.

Q1b: Do you think there should be a fixed percentage or should it vary in relation to the size, location or type of development?

Fixed.

Q2a: Should the Local Plan limit the percentage of BNG that can be delivered off-site?

No.

Q3: BNG measures would have a minimum 30 year maintenance plan that is linked to the planning permission. Should the Local Plan require a longer maintenance plan?

No.

Q10: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

The 2021 Environment Act requires development to achieve a mandatory 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The mandatory requirement provides a level playing field across England for developers and reduces the risks of unexpected costs and delays. Furthermore, 10% is not a cap on the aspirations of developers who want to voluntarily go further. Locally derived variations for a requirement for BNG above 10% and / or a limit the percentage of BNG delivered off-site and / or an extension of the maintenance plan beyond 30 years cause uncertainty and undermine the level playing field. If locally derived variations are pursued, additional costs should be included and tested in an updated Viability Assessment.

Topic Paper: Design

Q3a: Do you agree with the preferred option and the five suggested policy responses?

No.

Q3b: If not, why? Are there other policy responses?

The Council's preferred Option 2 commits to deliver zero carbon development within the plan period including under Bullet Point (4) to introduce a new building standards policy that requires new buildings to be zero carbon, in terms of the construction and lifetime use. The HBF disagree with this proposed policy response (see answers to Q7a & Q7b under Responding to the Climate Crisis).

Topic Paper: Economy and Employment

Q4: Do you agree that Option 3 is the best option?

No.

Q5: Are there any other Local Plan-related issues or options on this topic paper that you would like to raise?

The Council's preferred Option 3 proposes technical amendments to existing policies and to introduce a new policy including under Bullet Point (e) for larger development sites, a requirement that the proposal is accompanied by an Employment & Skills Plan (ESP) that shows how the development will materially contribute to helping the local economy be more self-sufficient and sustainable.

HBF supports the acquisition of construction skills among the workforce. In collaboration with the Construction Industry Training Board (CITB), the HBF has established the HBF Skills Partnership with the remit of increasing interest in careers in construction and the training requirements of this new construction workforce. Under Bullet Point (e), the Council's intentions are admirable, but the choice of an appropriate site threshold to define large development sites should ensure that this requirement will not disproportionately impact on local builders developing the smallest sites. Small and medium sized companies may not have the in-house resources to prepare an ESP in accordance with the Council's requirements. It is critical that a diverse range of companies operate within the house building industry. One of HBF's key messages is reversing the trend in the decline of small house building companies.

Topic Paper: Health, Social and Cultural Wellbeing

Q2a: Do you agree with the suggested policy options?

The HBF do not agree.

Q2b: If not, please explain why?

The Local Plan should not require all new housing to be zero carbon (see answers to Q7a & Q7b under Responding to the Climate Crisis).

If the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, the Council's proposed amendments to adopted Policy H4 under Bullet Point (ii) to include a requirement for types of accessible and adaptable housing will be unnecessary. In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49). The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327).

Topic Paper: Housing Affordability

Q1a: Are the suggested policy changes beneficial and deliverable?

Only some of the suggested policy changes may be beneficial and deliverable.

Q1b: Please explain why and any alternative solutions that could be used?

The allocation of more sites would help to deliver more affordable housing. However, any proposed suggestions to change the housing mix in favour of a higher proportion of smaller dwellings, to increase the percentage requirement for affordable housing sought, to alter qualifying thresholds on smaller development sites and / or to adjust affordable housing tenures should be supported and justified by robust evidence and tested in an updated Viability Assessment.

Topic Paper: Housing Need, Requirement, Land Supply and Delivery

Q1a: Is there an exceptional circumstance for Cotswold District to use an alternative approach to the standard method to calculate the minimum LHN?

No.

Q1b: Please explain why

As set out in the 2021 NPPF, the determination of the minimum number of homes needed should be informed by LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61). The NPPG also emphasises that there is an expectation for the use of the standard method and any other method will be used only in exceptional circumstances. In Cotswold District, there are no exceptional circumstances. Using the standard methodology, the minimum LHN is 490 dwellings per annum.

Q2a: Do you agree that Option 2 is the most appropriate option for the District to continue to deliver its housing requirement, maintain a five year housing land supply and pass the Housing Delivery Test?

No.

Q2b: Please explain why?

The Council's preferred Option 2 proposes to review and update the Local Plan housing requirement for the remainder of the Local Plan period up to 2031. The HBF do not agree with the Partial Update of the Cotswold Local Plan as proposed by the Council and consider that a full Local Plan Review should be pursued. In the HBF's opinion, the proposed Partial Update wastes valuable time and delays the preparation of the full Review. The 2021 NPPF requires that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities (para 22). The adopted Local Plan period ends in 2031, which is only 9 years away. Option 2 is also out of step with the emerging Gloucestershire Statement of Common Ground, which seeks to align plan making and plan periods across Gloucestershire to assist the coordination of strategic scale development and the provision of infrastructure. Other Gloucestershire authorities are updating respective Local Plans to 2040 (Stroud) or 2041 (Gloucester Cheltenham & Tewkesbury Joint Core Strategy and the Forest of Dean).

Q4b: How could the Local Plan further assist the specialist accommodation needs of older people?

To provide homes for older people, the Council should consider allocating sites for older persons housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres.

Conclusions

It is hoped that these responses are helpful to the Council in informing the next stages of plan-making. If the Council require any further information or assistance, please contact the undersigned.

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

A handwritten signature in blue ink, appearing to read 'Susan E Green', is positioned above the printed name.

Susan E Green MRTPI
Planning Manager – Local Plans