



Local Plan Review
Stroud District Council
Ebley Mill
Stroud
GL5 4UB

SENT BY E-MAIL AND POST

5th December 2017

Dear Sir / Madam

STROUD LOCAL PLAN REVIEW – ISSUES & OPTIONS CONSULTATION

Introduction

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 comments in response to specific questions in the Council's consultation document.

Q1a What are your priorities for Stroud District?

As set out in the National Planning Policy Framework (NPPF) the Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to meet identified housing needs. The Council should ensure that its Local Plan meets Objectively Assessed Housing Needs (OAHN) in full as far as is consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period. The Housing White Paper (HWP) "*Fixing The Broken Housing Market*" also emphasises that the Council should be planning for the right homes in the right places by making enough land available to meet assessed housing requirements. Therefore the Council's top priority should be meeting the housing needs of both the District and the Gloucestershire Housing Market Area (HMA) as a whole. There should be no mismatch between the Council's housing and economic growth priorities.

The HBF agree that all households should have access to different types of dwellings to meet their housing needs. The Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically

identified groups of households such as self / custom builders and the elderly but without seeking a specific overly prescriptive housing mix on individual sites.

Q3.1 How should we meet future development needs?

Before determining where the new dwellings should be put the Council has to establish its full OAHN. The adopted Local Plan sets out a housing requirement of 11,400 dwellings (456 dwellings per annum) for the period 2006 – 2031. The new Local plan will set out housing requirement for plan period 2016 – 2036. The latest calculation of OAHN is yet to be determined. Currently the National Planning Practice Guidance (NPPG) advises that OAHN should be unconstrained (ID 2a-004) and assessed in relation to the relevant functional area known as the HMA (ID 2a-008). Stroud District Council is part of the Gloucestershire HMA together with Tewksbury, Gloucester, Cheltenham, Cotswold and Forest of Dean. The NPPG methodology is a three stage process comprising :-

- Demographic (based on past population change and Household Formation Rates (HFR)) (ID 2a-015 – 017) ;
- Economic (in order to accommodate and not jeopardise future job growth) (ID 2a-018) ;
- Market signals (to counter-act worsening affordability caused by undersupply relative to demand) (ID 2a-019 & 020) ;
- Affordable housing need is separately assessed (ID 2a-022 – 028). The delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029).

However the Government has been critical that honest assessments of housing needs have not been undertaken by Councils. In the recent consultation “Planning for the Right Homes in the Right Places” the Government sets out its proposals for a standard methodology for the calculation of OAHN. The Government’s proposed methodology is summarised as :-

- 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.

By the time of the submission of the Stroud Local Plan Review for Examination the Government’s standard methodology will have been implemented. Using the proposed methodology the minimum OAHN for the Gloucestershire HMA is estimated as 3,255 dwellings per annum and for Stroud 632 dwellings per annum. The Council should give consideration to the implications of the Government’s proposal for a standardised methodology for OAHN. It is important that Stroud’s OAHN is not under-estimated.

In meeting future housing needs in full the HBF agreed that not all of these housing needs can be met via brownfield and infill development. It is also agreed that large sites can take a long time to develop. Therefore the best way to meet future needs is a combination of approaches as set out in Options 1, 2 and 3.

Question 3.2a We welcome views on whether the following broad locations should be considered for development, if needed, or whether you can identify better sites in Stroud District or in neighbouring areas that should be assessed : G1 - South of Hardwicke, G2 – Whaddon and G3 - South west of Brockworth?

In meeting housing needs there should be a bigger than local approach involving cross boundary collaboration throughout the Gloucestershire HMA and beyond so the distribution of housing needs is led by a strategic planning process. By the time of the examination of the Local Plan Review a Statement of Common Ground (SoCG) explaining cross boundary working as proposed in the HWP will be required. In considering a combination of Options 1, 2 and 3 it is appropriate for the Council to investigate broad locations on the Gloucester fringe. This is because functional linkages exist between the District and Gloucester which should be addressed by the Stroud Local Plan Review.

It is noted that the Council's timetable proposes that the new Local Plan will not be adopted until 2021 six years after the adoption of the existing Local Plan which is longer than the 5 yearly reviews proposed by the Government. Moreover this cannot be considered to fulfil the early review envisaged in the Stroud Local Plan Inspector's Final Report. The Council should consider speeding up its timetable for the Local Plan Review. It is also important that the Stroud Local Plan Review is co-ordinated with plan making processes in neighbouring authorities so that housing needs are met in full. The Stroud Local Plan Review should be co-ordinated with the early review commitments set out in the Gloucester Cheltenham & Tewkesbury Joint Core Strategy Inspector's Final Report which was recently published.

Question 3.3b We welcome views on the most appropriate locations for housing and employment growth on the southern edge of Stroud District.

In considering a combination of Options 1, 2 and 3 it is appropriate for the Council to investigate locations for housing growth on the southern edge of Stroud. This is because functional linkages exist between the District and South Gloucestershire and Bristol which should be addressed by the Stroud Local Plan Review. Also see answer to Q3.2a above.

Question 3.4 Do you agree with the current hierarchy-based approach towards identifying settlements suitable for different levels of development? Do you agree with the different tiers identified in the current Local Plan and the scale of development proposed for each tier?

The Towns & Villages settlement hierarchy of the current Local Plan and the scale of development proposed for each tier should be re-considered during the Local Plan Review.

Q3.5a How should development proposals on the edge of our towns and villages be managed?

The Local Plan Review should avoid an overly prescriptive inflexible approach to development proposals on the edge of towns and villages given the likely necessity to meet a higher housing requirement in the future. The overall Housing Land Supply (HLS) should not be planned to a minimum with no flexibility to respond to changing circumstances therefore sufficient headroom should be provided. As set out in the consultation document potential development sites should be considered throughout the District including in the Stroud Valley, the Stonehouse cluster, Cam & Dursley, the Gloucester fringe, the Berkeley cluster, the Severn Vale, the Wotton cluster and the Cotswold cluster. The HBF do not comment on the merits or otherwise of individual sites. However the HBF do advocate a diverse portfolio of housing sites to maximise housing delivery because a wide variety of sites by size, location and market type provides house builders of all types with access to suitable land in order to offer the widest possible range of products. This approach is also promoted in the HWP because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

Question 4.1 Are there any specific additional local studies or data that you believe are needed to inform the Local Plan review? Have you any advice on the scope or content of any of these studies?

The Local Plan Review should be prepared using new up to date evidence. Any new policy proposals for the adoption of optional higher housing standards should be fully justified by supporting evidence. This evidence should be specific to local housing needs rather than generic. Indeed optional higher housing standards should only be introduced in accordance with the criteria set out in the NPPG (ID 56-001 to 56-022).

Conclusion

It is hoped that these representations are of assistance to the Council in preparing the next stages of the Stroud Local Plan Review which to be found sound under the four tests of soundness as defined by the NPPF should be positively prepared, justified, effective and consistent with national policy. In the meantime if the Council requires any further assistance or information please contact the undersigned.

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



Susan E Green MRTPI
Planning Manager – Local Plans