

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 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 type="checkbox"/>	No	<input checked="" 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.

Duty to Co-operate

As set out in the 2019 NPPF, the Council is under a Duty to Co-operate with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Co-operate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground (SoCG) identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these

matters. Therefore, as set out in the 2019 NPPF, the LPR should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a).

Under **Core Policy CP2 - Strategic growth and development locations**, Stroud District will make a contribution to meeting the unmet housing needs of Gloucester City for the plan period by providing for growth at Land at Whaddon for 3,000 dwellings, subject to a requirement to meet unmet housing needs and consistency with the approved strategy for the Gloucester Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS) Review.

The latest National Planning Practice Guidance (NPPG) sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan, in order to provide communities and other stakeholders with a transparent picture of collaboration. Once published, the Council will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315). The Stroud LPR pre-submission consultation is accompanied by an unsigned Draft SoCG between the Gloucestershire authorities. However, this is only a statement of intention. The Council should agree a SoCG with the GCT JCS authorities, which sets out an agreed position on housing needs and the meeting of any unmet needs arising from Gloucester up to 2040.

Local Housing Need (LHN) & Housing Requirement

To meet the LHN of the District between 2020-2040, **Core Policy CP2 - Strategic Growth & Development Locations** proposes to accommodate at least 12,600 additional dwellings (630 dwellings per annum).

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period (para 65) (see HBF representations on Gloucester's unmet housing needs under Duty to Co-operate). 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 60). In Stroud, there are no exceptional circumstances to justify an alternative approach. The latest NPPG sets out the standard methodology for calculating the LHN figure (ID 2a-004-20201216).

The Council's estimated LHN is set out in Gloucestershire Local Housing Needs Assessment (LHNA) 2019 published in September 2020 by Opinion Research Services. The LHNA for Stroud is calculated as 638 dwellings per annum capped or 652 dwellings per annum uncapped (see Figure 1). As set out in the NPPG, the LHN is calculated at the start of the plan-making process, but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum

LHN for the District may change as inputs are variable. Using the standard methodology, the minimum LHN for Stroud is 630 dwellings per annum based on 2014 SNHP, 2021 as the current year and 2020 affordability ratio of 8.65.

The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It is important that the housing needs of Stroud are not under-estimated. The NPPG explains that “*circumstances*” may exist to justify a figure higher than the minimum LHN. The “*circumstances*” for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology. The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID 2a-010-20201216). It is noted that the 2020 Housing Delivery Test (HDT) Results identify housing completions of 666 dwellings in 2019/20, which significantly exceeds the adopted Local Plan housing requirement of 456 dwellings per annum and marginally exceeds the minimum LHN of 630 dwellings per annum. The Council should consider if there are “*circumstances*” to justify a housing requirement above the minimum LHN.

It is noted that there is no uplift from the minimum LHN starting point to support economic growth because various economic forecasts, which assume no change in the commuting rates identified in the 2011 Census, conclude there are sufficient resident workers to align with the growth in jobs. The 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council should be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth. The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF’s latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every additional house built in Stroud, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

The NPPG sets out that households whose needs are not met by the market, who are eligible for one or more of the types of affordable housing as defined in Annex 2 : Glossary of the 2019 NPPF, should be considered in need of affordable housing (ID 67-005-20190722). The Gloucestershire LHNA 2019 identifies an overall unadjusted affordable housing need of 424 dwellings per annum. This is significant in comparison to the minimum LHN representing 67%

of LHN, however, the Council's Viability Assessment demonstrates that only 30% affordable housing provision is viable. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. The Stroud District Housing Land Availability Report (at April 2020) shows that only 345 affordable dwellings were delivered between 2016 - 2020. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The HBF acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20201216). The NPPG states that a higher figure "*can be considered sound*" providing it "*adequately reflects current and future demographic trends and market signals*". However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes set out in the 2019 NPPF remains (para 59). A housing requirement above the minimum LHN would support economic growth, deliver more affordable housing given the significant identified need and contribute to any unmet housing needs from neighbouring authorities including Gloucester (see HBF representations under Duty to Co-operate above).

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 Stroud LPR pre-submission consultation is accompanied by an unsigned Draft SoCG between the Gloucestershire authorities. However, this is only a statement of intention. The Council should agree a SoCG with the GCT JCS authorities, which sets out an agreed position on housing needs and the meeting of any unmet needs arising from Gloucester up to 2040.

A housing requirement above the minimum LHN would support economic growth, deliver more affordable housing given the significant identified need and contribute to any unmet housing needs from neighbouring authorities including Gloucester.

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