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22nd January 2020

Dear Sir/Madam,

Re: Stroud Local Plan Review

This letter includes the formal comments from the National Custom & Self Build Association (NaCSBA) to the *Stroud Draft Local Plan Review Consultation*.

NaCSBA's mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process.

Custom & Self-Build

Current custom and self-build (CSB) policy in England has evolved over the last 5 years with the Self-build and Custom Housebuilding Bill, receiving Royal Assent on 26 March 2015. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that Stroud District Council do keep a self-build register which prospective self-builders can sign up to via the council's website.

The *Right to Build* legislation clearly demonstrates how the government intends for LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination.

The Housing and Planning Act 2016 conferred on LPAs the responsibility to:

"Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority's area..."

The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act.

Paragraph 61 of the revised National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state:

“The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”

Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF **paragraph 61** can be promoted in order to support the needs of custom and self-builders.

Recent appeal decisions such as a proposal for the erection of up to 5 self-build dwellings at The Meadows, Bromsberrow Heath, Ledbury (APP/P1615/W/18/3213122) have highlighted and confirmed the weight that should be afforded to self-build as a material consideration in determining planning applications, which in turn demonstrates the importance of CSB in housing delivery.

As a consequence of the policy and guidance outlined above, it seems clear that LPAs have a duty conferred upon them to actively meet the needs of those wishing to build their own homes.

CSB in the Stroud Local Plan

NaCSBA is pleased to note that the Stroud Local Plan Review (SLPR) makes reference to custom and self-build, and in particular in the key issues section at the beginning of the plan. Indeed, **Key Issue 16** acknowledges that providing opportunities for self-build/custom housing, smaller sized developments and new models for housing delivery will help to diversify and stimulate the housing market.

NaCSBA has some concerns therefore that in actual fact the policies contained within the plan, although on the surface may appear progressive and supportive of custom and self-build, will not actually do a great deal to increase the number of self-build opportunities provided within the district.

NaCSBA is encouraged to see that the emerging plan includes a policy relating specifically to custom and self-build, however it is concerned that, when analysed in detail, the contents of **Policy HC3** will not actually lead to delivery of the types of self-build opportunities that those who wish to build their own home are looking for. There is also no guarantee whatsoever that the policy will lead to an increase in the provision of custom and self-build opportunities.

Firstly, the policy states that:

The Council supports the provision of self-build and custom build dwellings within settlement development limits and single plot affordable self-build and custom build dwellings adjacent to settlement development limits.

This part of the policy will do nothing to encourage the delivery of any additional CSB homes over and above what would come forward if the LP did not include a policy relating to self-build, as residential proposals within settlement development limits are already supported by policy CP3. This part of the policy acts simply as signpost at best to the fact that CSB (along with all other housing types) are generally supported within settlement boundaries. NaCSBA fails to see how this part of HC3 will do anything to increase the level of CSB provision. Indeed, it can be argued to simply be a repetition of the content of policy CP3.

Secondly, the policy states that:

In addition, at strategic sites allocated within this Local Plan and in addition to the affordable housing component, a minimum of 2% of the dwellings shall be provided as plots suitable for self- or custom-build in order to meet Government aspirations to increase self-build developments, subject to appropriate demand being identified.

Again, whilst the intention to increase the level of provision of CSB opportunities is broadly welcomed, the detail of the policy does not bear scrutiny in terms of how effective it is likely to be. Self-builders do not generally want self-build plots on large estates. One of the primary reasons for self-build is to be able to construct a bespoke home on a bespoke plot. Furthermore, the policy 'expects a minimum of 2% of plots to be provided as plots suitable for self- or custom-build, but clarifies that this is subject to demand. However, it is not clear how this demand will be measured, nor on whom the responsibility will fall to identify the demand. There are issues of course with the lack of a demand measuring tool for CSB as well as with developers being potentially responsible for identification of that demand.

Other than Policy HC3, CSB is mentioned also in **Policy CP3**. CP3 is a detailed and informative policy which explains in which type of settlement, and where within those settlements different types of housing will be supported. Stroud BC is to be commended for such a comprehensible policy and for way that the policy is articulated visually in the plan.

However, as with policy HC3, NaCSBA is concerned that the policy does little to encourage an increase in the provision of CSB within the district. 'Market' CSB is identified within the policy to be encouraged only in areas where other market housing is encouraged, so doing little to increase provision compared to current rates. CSB is encouraged in ADL (adjoining development limits) areas, but only where it represents affordable self-build. There are some very successful rural exception policies within local plans that provide good opportunities for those who wish to pursue affordable provisions, however, the audience numbers are relatively limited.

It is considered that there opportunities to be innovative and allow a greater degree of flexibility, as in other local plans, policies are being introduced to facilitate the provision of 'Market' CSB on small sites, below 5 and medium sized sites of between 5 -20 developments which are contiguous with adjoining settlement limits, where services exist thus ensuing sustainability. NaCSBA considers that communities are more supportive of new well designed sustainably built dwellings for people on the self-build register who want to invest in their community and build a home for the long term.

CSB is a significant investment, and one for which individuals cannot afford to complete the build process only to find that their asset is restricted in value. As such, once again, it is considered that the reference to CSB in this part of the plan will do very little to increase opportunities for those wishing to build their own home.

In order to meet the requirements, set out by national policy, it is important that the Local Plan is proactive and progressive in the area of CSB. It is not considered sufficient to simply include a policy that simply states that the LPA will 'encourage delivery of building plots for custom and self-build, and percentage requirements on large sites are not considered appropriate for the vast majority of CSB demand.

Instead, in order for the plan to be considered to be positively prepared and Consistent with national policy it must demonstrate specifically and in some detail how it will ensure that the needs of custom and self-builders are to be met.

Recommendations

There are a number a different policy mechanisms that could be employed to ensure a steady and sufficient provision of CSB opportunities within the District, which would mean that the plan could be considered to meet needs of those wishing to build their own home, including:

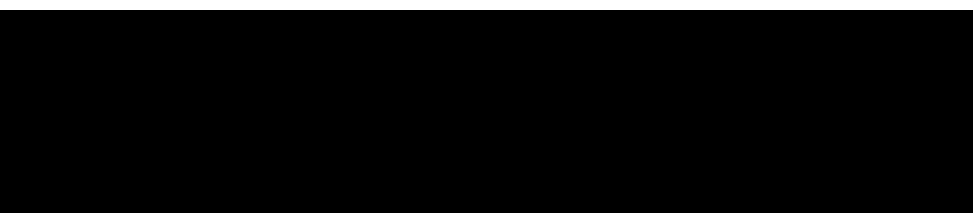
- Rather than just requiring 2% of units on large sites to be CSB, the LPA should seek to allocate small to medium sized sites of between 5 and 20 units specifically for 100% CSB. Self-builders would rather build their own home on a small/medium sized site with other bespoke self-build homes than on the corner of a large housing estate. A number of these sized developments around the district could be more in keeping with the nature of communities in which Custom and self-builders wish to live.
- Policies CP3 and HC3 should be amended to support the provision of single plot custom and small to medium sized CSB proposals in the identified ADL areas, where the development of an area of land would constitute rounding off and where it will not result in an unacceptable protrusion into the open countryside.

These two alterations would, in the view of NaCSBA, result in more appropriate CSB opportunities being delivered over and above the existing approach, allowing a broader offering of opportunities to be provided for CSB. It will result in attractive small /medium scale sites specifically identified for CSB being delivered and it will create a small number of plots on which CSB is deemed appropriate but on which regular developer-led proposals would not be acceptable, without adverse impacts upon the setting of the edge of the town or the open countryside.

It is considered that in order for the plan to be considered Positively prepared and Consistent with national policy at examination, it will be necessary to include both of the above recommendations in order to demonstrate that Stroud District Council is serious about seeking to meet the needs of those wishing to build their own home.

Please contact me if you require any additional information.

Kind regards,



(Managing Director of Foxley Tagg Planning)

This representation has been prepared on behalf of NaCSBA and its supporters, who are listed overleaf and comprise businesses and organisations in the custom- and self-build sector.





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