

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

### Delivery Policy HC3 - Self-build & Custom Build Housing Provision

On strategic site allocations, in addition to affordable housing, a minimum of 2% of the dwellings shall be provided as plots suitable for self- or custom-build. In determining the nature and scale of any provision, the Council will have regard to site-specific circumstances and local demand. Development briefs will set out how the self-build plots will be delivered and integrated into the wider scheme.

The Council's estimated of need for custom & self build housing is set out in Gloucestershire Local Housing Needs Assessment (LHNA) 2019 published in September 2020 by Opinion Research Services. In Stroud, the total number of entries on the Council's Register is 170 comprising 48 entries in 2016, 112 entries in 2016/17, 2 entries in 2017/18 and 8 (provisional) in 2018/19. The

introduction of a charge may be one reason for the decrease in interest since 2016/17. Overall, 56% of applicants have a local connection however many applicants wish to move into Gloucestershire rather than being existing residents.

As set out in the NPPG, the Council should use the Register and additional data from secondary sources to understand and consider future need for this type of housing (ID 57-011-20210208). A simple reference to the headline number of entries on the Council's Register may over-estimate actual demand. The Register may indicate a level of expression of interest in self & custom build but it cannot be reliably translated into actual demand should such plots be made available. The Register's entries may have insufficient financial resources to undertake a project, be registered in more than one local authority area and have specific preferences.

There is no legislative or national policy basis for imposing an obligation on landowners or developers of strategic sites to set aside a minimum of 2% as serviced plots for self and custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2019 NPPF (para 61), it is the Council's responsibility, not the landowner or developer, to ensure that sufficient permissions are given to meet demand. The Council is not empowered to restrict the use of land to deliver self-build housing. The NPPG sets out ways in which the Council should consider supporting self & custom build by "engaging" with developers and landowners and "encouraging" them to consider custom & self build where they are "interested" (ID 57-025-201760728).

There is a concern that by focussing on strategic sites the Council is supporting serviced plots on the sort of sites that do not normally appeal to those wishing to build their own home and limits choice for those wishing to build on smaller sites in or close to village locations. The Council should ensure that the LPR will result in a range of different custom & self build housing opportunities rather than only serviced plots on strategic sites. There are a number of alternative policy mechanisms that should be used to ensure a reliable and sufficient provision of self and custom build opportunities across the District including allocation of small and medium scale sites specifically for custom build and permitting custom and self build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

The provision of self & custom build plots on strategic sites adds to the complexity and logistics of developing such sites and therefore potentially slower delivery. It is unlikely that the provision of self & custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Any differential between the lead-in times / build out rates of self & custom build plots and the

development of the wider site means unfinished plots next to completed and occupied dwellings resulting in consumer dissatisfaction, construction work outside of specified working hours, building materials stored outside of designated compound areas, etc.

Where plots are not sold, the Council's policy should be clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.

As well as on-site practicalities impacts on viability should be tested. It is unclear if this policy requirement has been included in the appraisal of Strategic Sites (also see HBF representations under Deliverability & Viability). The provision of self & custom build plots will have a bearing on the development economics of the scheme. Site externals, site overheads, and enabling infrastructure costs are fixed and borne by the site developer. The developer will also have borne up front site promotion costs, including planning and acquisition costs. It is unlikely that these costs will be recouped because the plot price a self & custom builder is able to pay may be constrained by much higher build costs for self-builders. There are also impacts of not recouping profit otherwise obtainable if the house was built and sold on the open market by the site developer, disruption caused by building unsold plots out of sequence from the build programme of the wider site and a worst-case scenario of unsold plots remaining undeveloped to be considered.

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.

**Delivery Policy HC3** should be deleted.

**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