

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.

Core Policy DCP2 - Supporting Older People & People with Mobility Issues

Under **Core Policy DCP2**, 67% of both market and affordable homes should meet M4(2) and 8% should be to M4(3) of the Building Regulations. All specialist housing for older people should meet M4(2) and at least 25% should meet M4(3).

If the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states “that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”. As set out in the 2019 NPPF, all policies

should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focus focussed tightly on supporting and justifying the policies concerned (para 31). A policy requirement for M4(2) and M4(3) dwellings must be justified by credible and robust evidence. 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).

All new homes are built to M4(1) “visitable dwelling” standards. These standards include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. M4(1) standards are not usually available in the older existing housing stock. These standards benefit less able-bodied occupants and are likely to be suitable for most residents.

The Council’s estimated of need for accessible & adaptable homes is set out in Gloucestershire LHNA 2019. This evidence does not set out local circumstances, which demonstrate that the specific needs of Stroud differ substantially to those across Gloucestershire, the South West region or England. If the Government had intended that evidence of an ageing population alone (Figure 68) justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not currently the case.

Figures 77 & 78 set out numbers of households with long term illness or disability based on ORS modelling, however, not all health issues affect housing needs. No evidence is presented to suggest that households already housed would be prepared to leave their existing homes to move into new homes constructed to M4(2) standards. Many older people already live in the District and are unlikely to move home. Those who do move may not choose to live in a new dwelling. Recent research by Savills “Delivering New Homes Resiliently” published in October 2020 shows that over 60’s households “*are less inclined to buy a new home than a second-hand one, with only 7% doing so*”. The existing housing stock is significantly larger than its new build component, therefore adaption of existing stock will form an important part of the solution.

Figure 83 summarises the identified need for accessible & adaptable housing for M4(2) as 8,254 dwellings, M4(3) market housing as 684 dwellings and M4(3) affordable housing as 297 dwellings. This is the basis for proposing targets for all new housing of 67% for M4(2) and 8% for M4(3). Most of the identified growth in households with wheelchair users are aged 75 or over, many of these households are also identified as needing specialist housing for older persons. On this basis, the Council propose that all specialist housing for older people should meet M4(2) and at least 25% should meet M4(3). However, if higher targets for specialist housing for older persons are adopted, this could reduce the proportion of general needs housing that would need to meet optional standards for M4(2) and M4(3). This recommendation is not incorporated into the Council’s policy requirements.

The Council's evidence also advocates that by providing specialist accommodation for older persons, large numbers of currently underoccupied family homes in the existing housing stock could be vacated. Conversely accessible & adaptable dwellings, which allow people to live in their own homes for longer, could lead to under-occupation of new build family homes running at odds with the aim of making the best use of the housing stock.

The Council's Viability Assessment includes additional costs of £521 per dwelling for M4(2) and £10,111 per dwelling for M4(3), which have been indexed by 14.5% to £597 per dwellings and £11,577 per dwelling respectively (para 8.28). However, these costs are below alternative estimates. The Government's consultation "Raising Accessibility Standards for New Homes" (ended on 1st December 2020) estimates the additional cost per new dwelling, which would not already meet M4(2), is approximately £1,400. In September 2014 during the Government's Housing Standards Review, EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. M4(2) and M4(3) compliant dwellings are also larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), therefore larger sizes should be used when calculating additional build costs for M4(2) and M4(3) and any other input based on square meterage with the exception of sales values because enlarged sizes are unlikely to generate additional value (also see HBF representations under Deliverability & Viability).

Policy requirements for M4(2) and M4(3) dwellings have not been robustly justified nor sufficiently viability tested, which should be deleted.

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 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council's proposed policy approach will be unnecessary 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.

In the meantime, if these policy requirements are not deleted but retained, the NPPG specifics that "*Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or*

is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.” (ID 56-008-20160519).

The Council should distinguish between wheelchair accessible dwelling, which include the most common features required by wheelchair users (M4(3b)) and wheelchair adaptable dwelling, which include features to make a home easy to convert to be fully wheelchair accessible (M4(3a)). The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327).

Core Policy DCP2 should be modified accordingly.

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:

[Redacted Signature]

Date:

21/7/21