

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
Gloucestershire
GL5 4UB

SENT BY E MAIL ONLY TO
local.plan@stroud.gov.uk

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Dear Sir / Madam

STROUD DRAFT LOCAL PLAN REVIEW (LPR) CONSULTATION

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 responses to the Draft Stroud LPR.

Duty to Co-operate

To fully meet the legal requirements of the Duty to Co-operate, Stroud District Council should engage in a constructive, active and on-going basis with neighbouring Gloucestershire authorities to maximise the effectiveness of plan making. The LPR should be prepared through joint working on cross boundary issues. A key element of Local Plan Examination is ensuring that there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters when Local Plans are adopted. As set out in the 2019 National Planning Policy Framework (NPPF) (paras 24, 26 & 27), the Council should provide a signed Statement of Common Ground (SoCG). The LPR should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (para 35c).

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 2,500 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 HBF note that the Draft Stroud LPR is not accompanied by a SoCG. The Council must 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. The HBF will submit further representations on the Council's compliance with the Duty to Co-operate at the time of the LPR pre-submission consultation.

Local Housing Needs (LHN)

Core Policy CP2 - Strategic growth and development locations proposes to accommodate at least 12,800 additional dwellings and 650 additional care home bed-spaces to meet the housing needs of the District for the period 2020-2040.

As set out in the 2019 NPPF, the determination of the minimum number of homes needed should be informed by a LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). As set out in the latest NPPG, the LHN figure is calculated at the start of the plan-making process however this number should be kept under review and revised when appropriate (ID 2a-008-20190220). The LHN figure may change as inputs are variable and this should be taken into consideration. The Government has also confirmed its intention to review the standard methodology over the next 18 months. If the Government applies a different approach following this proposed review, it may be necessary for the Council to update its LHN assessment.

The Council's latest LHN assessment is set out in Gloucestershire Local Housing Needs Assessment dated October 2019 by Opinion Research Services. For Stroud a minimum LHN of 638 dwellings per annum calculated using 2014-based SNHP, 2019 as the current year, 2018-based affordability ratio and 40% cap is mathematically correct.

As set out in the NPPG, the application of a cap does not reduce housing need itself. Strategic policies adopted with a cap applied may require early review to ensure that any housing need above the capped level is planned for as soon as reasonably possible. Where the minimum annual LHN figure is subject to a cap consideration can still be given to whether a higher level of housing need could be realistically delivered to remove the necessity for an early review (ID : 2a-007-20190220). If a capped LHN figure is used, then the Stroud LPR should be subject to an early review mechanism.

However, if the LPR is not submitted by November 2020 then the strategic policies for housing will no longer be considered up-to-date (adopted within the last 5 years) and the applicability of 40% cap will cease, which would increase the minimum LHN to 652 dwellings per annum based on current calculations.

It is important that the housing needs of Stroud are not under-estimated. The Government's objective of significantly boosting the supply of homes remains. Until the Stroud LPR is submitted for examination the Council's LHN assessment should be kept under review because it is most likely that the LHN figure will increase.

Housing Requirement

LHN assessment is only a minimum starting point and any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above LHN.

It is noted that there is no uplift from the minimum LHN starting point to support economic growth because there is considered to be sufficient resident workers to align with the jobs growth identified by various economic forecasts assuming no change in the commuting rates identified by the 2011 Census.

The Council's latest evidence of affordable housing need is 425 dwellings per annum, which represents 66% / 65% of capped / uncapped LHN figures respectively. 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. Since 1st April 2016 only 111 affordable housing dwellings have been delivered, which is significantly below identified affordable housing needs. It is acknowledged that the Council will not be able to meet all affordable housing needs but an uplift to the LPR housing requirement figure above the minimum LHN assessment figure will make some contribution to meeting affordable housing needs. 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 housing requirement figure in the LPR should include unmet housing needs from Gloucester (see comments under Duty to Co-operate).

A housing requirement figure greater than LHN should be set out in the pre-submission LPR.

Housing Land Supply (HLS)

The LPR's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver a housing requirement, which meets the District's LHN and assists in meeting unmet housing needs from Gloucester. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements.

The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is

provided therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

Core Policy CP2 - Strategic growth and development locations proposes strategic development site allocations for circa 7,680 dwellings at the following locations :-

- Cam North West for 700 dwellings ;
- Cam North East Extension for 180 dwellings ;
- South of Hardwicke for 1,200 dwellings ;
- Hunts Grove Extension for 750 dwellings ;
- Sharpness Docks for 300 dwellings ;
- Sharpness for 2,400 dwellings (5,000 dwellings by 2050) ;
- Stonehouse North West for 650 dwellings ; and
- Wisloe for 1,500 dwellings.

Local development site allocations for circa 1,045 dwellings are proposed in Berkeley, Brimscombe & Thrupp, Cam, Dursley, Frampton-on-Severn, Kingswood, Leonard Stanley, Minchinhampton, Nailsworth, Newtown & Sharpness, Painswick, Stonehouse, Stroud and Whitminster.

The HBF submit no comments on the merits or otherwise of individual strategic / non-strategic sites proposed for allocation. Our responses to this consultation are submitted without prejudice to any comments made by other parties.

The Council's HLS should be based on correct and realistic assumptions about lapse rates, non-implementation allowances, lead in times and delivery rates. These assumptions should be supported by parties responsible for delivery of housing. National policy permits an allowance for windfall sites only if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.

In addition to allocated sites, development will take place in accordance with the **Core Policy CP3 - Settlement Hierarchy**. The proposed settlement hierarchy comprises :-

- Tier 1 - Main settlements of Cam & Dursley, Stonehouse and Stroud ;
- Tier 2 - Local Service Centres of Berkeley, Minchinhampton, Nailsworth, Painswick, Wotton Under Edge and Hunts Grove ;
- Tier 3a - Accessible Settlements with Local Facilities of Hardwicke, Chalford, Manor Village (Bussage), Brimscombe & Thrupp, Eastington,

- Kings Stanley, Leonard Stanley, Frampton on Severn, Newtown & Sharpness, Kingswood, Whitminster and North Woodchester ;
- Tier 3b – Settlements with Local Facilities of Whiteshill & Ruscombe, Upton St Leonards, Uley, Slimbridge, Bisley, Coaley, North Nibley, Oakridge Lynch, Amberley, Horsley and Miserden ;
 - Tier 4a - Accessible Settlements with Basic Facilities of “Old” Bussage, Cambridge, Eastcombe, Newport, Nymphsfield, Selsley and South Woodchester ; and
 - Tier 4b – Settlements with Basic Facilities of Arlingham, Box, Brookthorpe, Cranham, France Lynch, Haresfield, Hillesley, Longney, Middleyard, Randwick, Saul, Sheepscombe, Stinchcombe and Stone.

All settlements identified in this Policy have defined settlement boundaries or “Settlement Development Limits” (SDL), within and (exceptionally) adjacent to which suitable development may be permitted. The HBF suggest that proposed SDLs should be drawn to encompass all proposed site allocations.

Housing development within SDLs and other limited housing development specifically allowed for by other policies in the LPR at locations outside of SDLs, will be permitted subject meeting all specified criteria of **Delivery Policy DHC1 - Meeting housing need within defined settlements** and **Delivery Policy HC1 - Detailed criteria for new housing developments**. In Tier 4 settlements support for small housing schemes of up to 9 dwellings (not exceeding a 10% cumulative increase in settlement’s total dwellings during the plan period) outside SDLs are also subject to criteria set out in **Delivery Policy DHC2 - Sustainable rural communities**.

It is noted that satisfying all criteria set out in Delivery Policies DHC1, HC1 and DHC2 is very restrictive and less permissible than suggested by Core Policies CP2 and CP3. The HBF suggest that a more flexible policy approach should be applicable if the Council was unable to demonstrate a 5 YHLS and / or failed HDT.

Very small settlements not mentioned in the settlement hierarchy will be treated as open countryside, where development will be restricted to that which contributes to diverse and sustainable farming enterprises, recreation, tourism, or involves the conversion of rural buildings and the provision of essential community facilities, in accordance with **Core Policy CP15**.

The Council’s overall HLS to 2040 is estimated as 15,298 dwellings comprising of :-

- existing commitments less undeliverable sites of 5,223 dwellings ;
- LPR allocations of 8,724 dwellings ; and
- 1,350 dwellings from windfall allowance of 75 dwellings per annum over 18 years.

There is a headroom of 2,042 dwellings (26%) against the District’s LHN (excluding unmet needs from Gloucester) to 2040. The HBF always advocates

as large a contingency as possible to treat the housing requirement as a minimum rather than a maximum, to provide optimum flexibility to respond to changing circumstances as well as providing greater choice and competition in the land market. There is no numerical formula to determine a contingency quantum but where the HLS is highly dependent upon one or relatively few large strategic sites and / or localities then greater numerical flexibility is necessary than if the HLS is more diversified. In Stroud, there are some delivery concerns relating to strategic sites in and around Sharpness. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies.

As set out in the 2019 NPPF (para 68a) at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. For Stroud 10% of the minimum LHN is circa 1,280 dwellings. Before the LPR pre-submission consultation, the Council should ensure that the LPR is consistent with 2019 NPPF (para 68a).

Strategic & Non-strategic Policies

As set out in the 2019 NPPF, the LPR should include strategic policies which address the Council's identified strategic priorities for the development and use of land in the plan area (para 17). These strategic policies should set out an overall strategy for the pattern, scale and quality of development (para 20). The LPR should make explicit which policies are strategic policies (para 21) and clearly distinguish non-strategic policies from strategic policies (Footnote 13). Before the LPR pre-submission consultation, a statement identifying strategic and non-strategic policies respectively should be incorporated into the LPR.

Housing Policies

Core Policy CP9 - Affordable housing

On sites of 10 or more dwellings provision of at least 30% affordable housing will be required. Within the Cotswolds Area of Outstanding Natural Beauty (AONB) or the designated rural parishes of Alderley, Alkington, Amberley, Arlingham, Bisley with Lypiatt, Brookthorpe with Whaddon, Coaley, Cranham, Eastington, Frampton on Severn, Fretherne with Saul, Frocester, Ham & Stone, Hamfallow, Harescombe, Haresfield, Hillesley & Tresham, Hinton, Horsley, Kingswood, Longney & Epney, Miserden, Moreton Valance, North Nibley, Nymphsfield, Painswick, Pitchcombe, Slimbridge, Standish, Stinchcombe, Uley and Whitminster, on sites of 4 or more dwellings at least 30% affordable housing provision will be required.

The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors.

It is noted that throughout the LPR document there is an inconsistency in reference to the lower site threshold in Designated Rural Areas which is referred

to as either 5 or more or 4 or more dwellings. Before the LPR pre-submission consultation, this inconsistency should be corrected and clarified by the Council.

The Council should also clarify compliance with 2019 NPPF affordable housing Glossary definitions and affordable housing tenure mix requirements (para 64).

The requirement for provision of at least 30% affordable housing on-site on smaller sites of 4 or more dwellings in Cotswold AONB and other Designated Rural Areas may be impractical. The Council's policy approach should be more flexible so that where appropriate commuted sums for off-site provision is also acceptable.

The LPR should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. As set out in the 2019 NPPF such policy requirements should not undermine the deliverability of the LPR (para 34). It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development and if development is financially viable. Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative impact of policy compliant requirements and other infrastructure contributions should be set so that most sites are deliverable without further viability assessment negotiations (para 57). Before the LPR pre-submission consultation, the Council should undertake an updated Whole Plan Viability Assessment.

Delivery Policy HC3 - Self-build and custom build housing provision

Under the Self Build & Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self & custom build. These are :-

- developing policies in the Local Plan for self & custom build ;
- using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self & custom housebuilding.

The HBF is supportive of proposals to encourage self & custom build for its potential additional contribution to overall HLS. Therefore, the HBF is supportive of the Council's approach to the provision of self & custom build

dwellings within SDLs and single plot affordable self & custom build dwellings adjacent to SDLs as proposed in Delivery Policy HC3.

The HBF is not supportive of a policy requirement for the inclusion of a minimum of 2% self & custom build plots on allocated strategic residential development sites as proposed in Delivery Policy HC3, which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The Council should not seek to place the burden for delivery of self & custom build plots on to developers of strategic sites contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build. The Council's proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots as part of the housing mix on new housing development.

All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on larger strategic housing sites. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. 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. Indeed Figure 53 of Gloucestershire Local Housing Needs Assessment dated October 2019 by Opinion Research Services only identifies 166 entries on the Council's Register. There is the potential for an oversupply of self & custom build plots against a limited demand.

The Council's policy approach should be realistic to ensure that where self & custom build plots are provided, they are delivered and do not remain unsold. 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. If demand for plots is not realised there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's overall HLS.

Where plots are not sold it is important that the Council's policy is 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 from the commencement of development. 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. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the Local Plan in order that the cumulative financial impact of policy requirements are set so that most development is deliverable without further viability assessment negotiations and the deliverability of the Local Plan is not undermined. Self & custom build dwellings are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. There may be a detrimental impact upon the level of affordable housing provision achieved on strategic housing developments. The Council may wish to adopt an aspirational approach in provision of plots to deliver self & custom build but this should not be pursued at the expense of delivering affordable housing.

Before the LPR pre-submission consultation, Delivery Policy HC3 should be modified to delete the requirement for a minimum of 2% self & custom build plots on allocated strategic sites.

Other Policies

Core Policy DCP1 - Delivering Carbon Neutral by 2030 and Delivery Policy ES1 - Sustainable construction & design

Under **Core Policy DCP1**, Stroud District will become Carbon Neutral by 2030 ahead of the Government target of net Zero Carbon 2050. All new development must be designed to follow the Energy Hierarchy principle of reducing energy demand, supplying energy efficiently and using onsite low or zero carbon energy generation to meet standards, which move progressively towards zero carbon, in terms both of regulated and unregulated emissions. Accordingly, new development should be constructed to achieve the highest viable energy efficiency and designed to maximise the delivery of decentralised renewable or low-carbon energy generation.

Under **Delivery Policy ES1**, all new development should achieve a net- zero carbon standard by means of :-

- an overall minimum 35% reduction in emissions over Part L 2013 Building Regulations achieved onsite ;
- a minimum of 10% and 15% reduction in emissions over Part L 2013 Building Regulations achieved respectively in homes through fabric energy efficiency improvements ; and

- residual emissions offset through payments to a Stroud District Council carbon offset fund.

Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions. These standards are required unless it can be clearly demonstrated that they are not viable for the development in question.

Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

Currently, the Government is consulting (ends on 7th February 2020) on The Future Homes Standard. The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. This current consultation addresses :-

- options to uplift standards for Part L (Conservation of Fuel & Power) Building Regulations in 2020 and changes to Part F (Ventilation) Building Regulations. An increase in energy efficiency requirements for new homes in 2020 will be a meaningful and achievable stepping-stone to the Future Homes Standard in 2025. This is expected to be achieved through very high fabric standards and a low carbon heating system based on one of two options. The Government's preferred Option 2 proposes 31% reduction in carbon emissions compared to current standards (Approved Document L 2013) delivered by installation of carbon saving technology and better fabric standards. Both options increase costs for housebuilders (estimated costs between circa £2,557 - £4,847 per dwelling) ;
- transitional arrangements to encourage quicker implementation ; and
- clarifying the role of Local Planning Authorities (LPA) in setting energy efficiency standards. The Government is proposing to remove the ability of LPAs to set higher energy efficiency standards than those in Building Regulations which has led to disparate standards across the country and inefficiencies in supply chains. The Government wants to create

certainty and consistency. The situation is confusing with decisions about technical appropriateness, application and enforcement of energy standards considered by planning officers, committees and Planning Inspectors rather than by qualified Building Inspectors. An uplift to Part L standards in 2020 will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet the Future Homes Standard so there is no need for LPAs to seek higher standards.

The Council should not be getting ahead of national policy, which is expected to come into effect mid / late 2020. Before the LPR pre-submission consultation, Core Policy DPC1 and Delivery Policy ES1 should be modified to align with Government proposals.

Bullet Point 8 of Delivery Policy ES1 - Sustainable construction & design and Delivery Policy EI12 - Promoting transport choice & accessibility

Bullet Point 8 of Delivery Policy ES1 also proposes that new developments with off road parking should provide electric vehicle charging points (HQM or equivalent).

Delivery Policy EI12 proposes that vehicular parking standards for new development should be provided in accordance with the adopted standards set out in LPR Appendix 2. Appendix 3 states that every new residential building with an associated car parking space will have a charge point. To be classified as a charge point for the purpose of policy compliance, each charge point must be a minimum 7kW and be at least Mode 3 or equivalent.

It is noted that there is a typographical reference error to Appendix 2 rather than Appendix 3 in Delivery Policy EI12, which should be corrected.

The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings was held by the Department for Transport (ended on 7th October 2019).

This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal

socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M.

The Government has estimated installation of such charging points add on an additional cost of approximately £976. This cost should be included in the Council's updated Viability Assessment.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

It is the HBF's opinion that the Council should not be getting ahead of Government proposals for Building Regulations. Before the LPR pre-submission consultation, the requirement for EVCPs should be deleted from Delivery Policies ES1 and EI12.

Core Policy 4 - Place making and Delivery Policy ES12 - Better design of places

Under **Core Policy 4**, all development proposals shall accord with the Mini Visions and have regard to the guiding principles for that locality as set out in the LPR, and shall be informed by other relevant documents, such as any design statements adopted as Supplementary Planning Documents (SPD).

Under **Delivery Policy ES12**, all new development must be based on thorough site appraisal including reference to any adopted Design Statements, Design Codes, Neighbourhood Development Plans and Secured by Design standards.

These references to guidance and SPDs should not be interpreted by Development Management Officers as conveying the weight of a Development Plan Document onto guidance, which has not been subject to examination and does not form part of the LPR. These references should be removed. If inserted into supporting text, the Council should only be stating that development proposals should have regard to rather than accord with any such standards and guidance.

Delivery Policy ES16 - Public art contributions

This policy requires proportionate contributions towards the provision of publicly accessible art and design works from development proposals comprising major residential schemes. Smaller schemes will be encouraged to include public art as a means of enhancing the development's quality and appearance. The level of contribution will be negotiated on an individual basis dependent upon the nature of the development proposal and the impact of this requirement on the economic viability of the development proposal.

It is assumed that the Council proposes to require public art contributions by legal agreement and / or planning condition. As set out in the 2019 NPPF, an otherwise unacceptable development can be made acceptable by using planning conditions or obligations. The Council should provide evidence to justify the reasons that residential development without contributions to public art is unacceptable. Planning conditions should only be imposed where they are necessary and relevant (para 55) whilst planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition (para 54). The 2019 NPPF also sets out three tests to be met when a planning obligation is sought (para 56). This policy requirement does not pass all three tests. Before the LPR pre-submission consultation, this unsound policy should be deleted.

Conclusion

It is hoped that these responses are helpful to the Council in informing the pre-submission stage of the Stroud LPR. If any further information or assistance is required, please contact the undersigned.

Yours faithfully

