

Stroud District Council

**Response to the
Stroud District Local
Plan Review, Draft
Plan 2019 (“SDLPR”)**

Prepared by:

Pioneer Property Services Ltd

On behalf of:

Robert Hitchins Ltd

Date:

16th January 2020



Contents:

Page:

1	INTRODUCTION	3
2	CORE POLICY CP7 LIFETIME COMMUNITIES	3
	<i>CORE POLICY 7 PROPOSED MODIFICATIONS</i>	<i>4</i>
3	CORE POLICY CP8 NEW HOUSING DEVELOPMENT	4
	<i>CORE POLICY 8 PROPOSED MODIFICATIONS</i>	<i>6</i>
4	CORE POLICY CP9 AFFORDABLE HOUSING	6
	<i>CORE POLICY 9 PROPOSED MODIFICATIONS</i>	<i>18</i>
5	DELIVERY POLICY HC3 SELF-BUILD AND CUSTOM BUILD HOUSING	19
	<i>DELIVERY POLICY HC3 PROPOSED MODIFICATIONS.....</i>	<i>25</i>
6	APPENDIX 1	27
7	APPENDIX 2	33

1 Introduction

- 1.1 This document has been prepared by Pioneer Property Services Ltd on behalf of Robert Hitchins Ltd in response to the Stroud District Local Plan Review 2019 (“SDLPR”). The following sections present responses on proposed changes, or in some cases the lack of proposed changes, to the wording of Policies CP7, CP8, CP9 and HC3 – the District Council’s proposed wording of these policies is provided in Appendix 1 to this document. Proposed modifications are set out in bold text at the end of each section; additional proposed text is underlined and deletions are shown as struck through text.

2 Core Policy CP7 Lifetime Communities

- 2.1 The Council is not proposing any changes to this policy. However, this is a missed opportunity to re-visit the wording of this Policy within the context of the latest National Planning Policy context and given the concerns which were raised when the current Stroud Local Plan was prepared and which remained unaddressed during the examination process.
- 2.2 The policy requirements within Core Policy CP7 are not clearly defined, and the wording is very vague in terms of what housing developments will be specifically required to provide. What will be the measure of whether the requirements and factors listed are achieved by the applicant?
- 2.3 How can proposals be developed with any certainty and assessment of costs be undertaken unless these matters are clearly defined by the Council? What is meant by ‘health and wellbeing service co-ordination’? What is meant by ‘Lifetime Accommodation’ in the context of the current national policy approach to housing standards? Is this the same thing as Lifetime Homes Standards or another standard which the Council intends to introduce?
- 2.4 How in practice will development proposals be expected to take into account the ‘needs’ of children, young people and families? Has the Council undertaken an objective assessment of the specific needs referred to which clearly identifies and quantifies the requirements of the groups referred to thus enabling developers and decision takers to understand how the policy is to be applied?
- 2.5 Given that the Stroud District Local Plan is the subject of a review has the Council assessed the cumulative impact upon development of the cost of imposing the indistinctly described requirements within an up to date viability assessment (the last viability assessment

appearing to be the one published in March 2016 to assess Community Infrastructure Levy viability – i.e. prior to: i) the changes to CIL Regulations removing pooling restrictions through the deletion of Regulation 123 and with CIL and s106 increasingly being used to fund the same piece of infrastructure, and ii) the current iteration of the National Planning Policy Framework – “NPPF”)?

- 2.6 Can the Council demonstrate how the obligations / conditions which they impose through Policy CP7 (and which are particularly unclear within the policy wording) accord with the statutory CIL Regulation 122 tests / the tests in paragraph 55 and 56 of the NPPF?

Core Policy 7 Proposed Modifications

- i) **It remains the contention that as worded draft Core Policy 7 is unsound and should be deleted: it is unclear that it has been positively prepared, or that it is justified, effective or consistent with national policy. It is not possible to suggest alternative wording for the Council’s consideration given the vagueness of what, specifically, the policy is seeking for developments to provide. The wording is more akin to that used to describe a strategic objective than a policy requirement and perhaps this is how it should be presented within the SDLPR.**

3 Core Policy CP8 New Housing Development

- 3.1 It is noted that the proposed wording of the first paragraph Policy CP8 has been amended to introduce an expectation that ‘in particular, on major sites’ ‘the range of types, tenures and sizes should reflect the housing needs identified for that Parish Cluster area’. This is in addition to taking account of the District housing needs set out in the Local Housing Needs Assessment.
- 3.2 The first issue with this expectation is that developments are being expected to reflect both District and Parish Cluster housing needs – these needs may not always align in terms of dwelling types, tenures and mix; it is unclear which of these housing needs profiles the policy would require an application proposal to meet.
- 3.3 A second issue is that, whilst reflecting Parish ‘Cluster’ housing needs may be appropriate on a numerically small scheme, larger schemes will inevitably house households from further afield and therefore will need to reflect a broader housing requirement relating to either the

District or even a wider housing market area. The policy wording does not provide clarity on this issue as the requirement to reflect the needs of the Parish Cluster appears to relate to all sites, including 'major sites' – whilst the latter is not defined in the Policy if the National Planning Policy Framework definition is applied this will include sites of 10 or more dwellings / 0.5ha or more.

- 3.4 A third issue is that whilst the Parish Clusters themselves are identified at page 3 of the draft SDLPR it is unclear how Parish Cluster needs are to be met when there is no assessment of these within the draft 2019 Gloucestershire Local Housing Needs Assessment (“draft LHNA”) evidence base. Furthermore, only a small number of Neighbourhood Plans are made and the evidence base on housing needs for these (where it is available) does not provide an assessment of housing need across whole Parish Cluster areas. Given the lack of evidence to underpin the policy wording requirement or against which to assess proposals it is unclear how it will be applied in practice.
- 3.5 In addition, the existing viability evidence base is not only three years old but also does not reflect the impact of different housing mix and tenure requirements where there are to be applied at a Parish Cluster level.
- 3.6 Bullet point 4 within Policy CP8 remains unchanged from the existing Stroud Local Plan. However, it should be amended through this review process. The wording itself is vague in terms of what standards development proposals are expected to be constructed to. In any event, where local authorities wish to impose standards in excess of mandatory Building Regulation requirements this needs to be applied in accordance with the National Planning Policy Guidance on Technical Optional Standards.
- 3.7 The ‘Housing: optional technical standards’ section of the NPPG confirms that the policy for the application of optional technical standards is set out in the written ministerial statement of the 25th of March 2015 to be taken into account in Plan making. This states that:

“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance. Neighbourhood plans should not be used to apply the new national technical standards.”

(Written Statement to Parliament, ‘Planning Update March 2015’)

and that:

“From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”

(Written Statement to Parliament, ‘Planning Update March 2015’)

The Ministerial Statement withdrew the Code for Sustainable Homes and energy performance requirements are now set through Building Regulations with an optional standards being available in respect of accessibility and wheelchair standards, water efficiency and internal space standards. For this reason bullet point 4 should be removed from the SDLPR.

Core Policy 8 Proposed Modifications

- i) The Second sentence in paragraph 1 of Core Policy CP8 should be amended as follows:

“New developments should take account of the District's housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that the range of types, tenures and sizes should reflect the housing needs ~~identified for that Parish Cluster area.~~”

- ii) Bullet point four should be deleted from Core Policy CP8.

4 Core Policy CP9 Affordable Housing

First Paragraph, Core Policy 9

- 4.1 The first line of Core Policy 9 Affordable Housing has been amended to refer to a 425 annual affordable housing need (as opposed to the 446 affordable housing need within the adopted Stroud Local District Local Plan wording). The 425 figure appears to be based on Figure 50 within the draft LHNA (the figure in the draft LHNA, at 8,476, appears to have been rounded up to 8,500).

- 4.2 This includes not only households in affordable housing need on the basis that they cannot afford market housing for rent or sale (2,207), but also households already living in the private rented sector with the assistance of Housing Benefit (1,639) and households aspiring to 'homeownership' (4,630) (based on analysis of households in the private rented sector, paying their own rent without Housing Benefit and aspiring to home ownership but being unable to afford it).
- 4.3 However, the draft LHNA states that, whilst households renting in the Private Rented Sector with Housing Benefit would require affordable housing if Housing Benefit were no longer to be available to them in line with current trends, they are currently considered to be able to afford their market housing with the assistance of Housing Benefit and are therefore excluded from the calculation of affordable housing need (Paragraphs 8.49 and 8.50, draft LHNA).
- 4.4 On this basis the draft LHNA concludes (in Figure 48) an overall affordable housing need (including households aspiring to home ownership) for 6,873 homes over 20 years (344 per annum – i.e. below the 425 annual requirement set out in Core Policy 9 of the SDLPR).
- 4.5 Of this housing need 4,630 are households aspiring to affordable home ownership options.¹ Of the 2,207 households unable to rent or buy in the market a further proportion 16% (at a County level – local authority levels are not identified) are suggested to be able to afford a Shared Ownership home. Applied to the 2,207 households unable to rent or buy in the market across the District this would suggest 353 households could afford a shared ownership product. In conjunction with the 4,630 aspiring homeowners suggested to need affordable home ownership products this suggests that up to 4,983 of the overall 6,873 affordable housing need across Stroud District suggested in the draft LHNA (i.e. c.73%) require affordable housing for sale as opposed to rent.
- 4.6 As the SDLPR draws on the draft LHNA outcomes for overall affordable housing need which include households aspiring to home ownership the relevant tenure proportions will need to be reflected when negotiating affordable housing provision (i.e. 73% of households eligible for affordable housing need affordable housing for sale as opposed to rent). The first paragraph should be amended to reflect the overall affordable housing need concluded by the draft LHNA and the tenure split that applies to it.

¹ Figure 48, draft LHNA

4.7 In this regard it is relevant to note that the 2019 Conservative Election Manifesto re-confirms the Government's commitment to widening opportunities for home ownership, including through a variety of subsidised routes. This commitment has been re-stated within the December 2019 Queen's speech through the proposed introduction of 'First Home' – this initiative is intended to provide homes for sale to 'local people' and 'key workers' at a 30% discount to their market value, with the discount being secured in perpetuity by way of a covenant. The Queen's speech also re-stated the commitment to make the Shared Ownership purchase process 'fairer and more transparent'.

Second Paragraph, Second Sentence, Core Policy 9

4.8 Much of Core Policy 9 in the SDLPR remains as previously worded in the adopted Stroud District Local Plan. However, in this respect many of the existing concerns raised previously when the Stroud District Plan was prepared also apply to the SDLPR Core Policy 9. In particular, concerns remain in respect of the second sentence within the second paragraph in Core Policy 9.

4.9 This suggests that affordable housing should be provided in a mix that reflects the 'dwelling sizes' in the proposed development. This implies that the Council may seek affordable housing in a 'pro-rata' mix of the market dwellings to be provided on the development. This approach contradicts the initial half of the same sentence which suggests that affordable dwelling sizes and types should reflect 'proven' housing needs of people unable to resolve their housing requirements on the open market. Provision in a pro-rata mix may not align with provision to meet 'proven' affordable housing needs. Such a conflict will lead to uncertainty resulting in protracted negotiations between developers and the Council and the delivery of affordable housing that does not reflect the assessed need.

4.10 The approach taken in the second half of the second sentence in paragraph two of draft Core Policy CP9 fails to reflect that the dynamics of market housing differ to those of affordable housing.

4.11 The National Planning Policy Framework (updated in February 2019) states that:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and

market signals...any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

(paragraph 60, page 17, NPPF)

Specifically in respect of housing mix (non-tenure specific) the NPPF goes on in the following paragraph to state that:

“Within this context, 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).”

(paragraph 61, page 17, NPPF – emphasis added)

As such, the NPPF does not encourage or suggest the imposition of blanket market housing mix policy requirements or of an affordable housing mix that is pro-rata that of market housing mix proposals, but instead sets out that housing mix, type and tenure etcetera should be identified for ‘different groups’ in the community and ‘reflected’ in policy.

4.12 This is to be read in conjunction with the approach specifically to affordable housing in paragraph 62 of the NPPF which states that ‘where a need for affordable housing is identified, planning policies should specify the type’ required in accordance with the affordable housing definitions in Annex 2 of the NPPF.

4.13 Within the ‘Housing and economic needs assessment’ section of the of national planning policy guidance (“NPPG”) published as part of the online guidance provided to accompany the NPPF the only reference to housing mix is as follows:

“Strategic policy-making authorities will need to look at the current stock of houses of different sizes and assess whether these match current and future needs.”

(Paragraph: 023 Reference ID: 2a-023-20190220, NPPG)

4.14 In July 2019 an additional section of the NPPG entitled ‘Housing needs of different groups’ was published. However, whilst this provides broad advice on an assessment methodology for overall affordable housing need (in line with that provided previously within Government guidance) and vague commentary (albeit without a proposed methodology) on the

assessment of overall need for private rented, self-build / custom build and student housing, it provides no guidance on the methodology or approach to the assessment of types and sizes of housing (market or affordable).

- 4.15 Therefore, whilst affordable housing policies should specify the type of affordable housing needed based on the NPPF, it is inherent in national planning policy and guidance that any approach to market mix should remain flexible when making Plan policies or development control decisions. The wording of Core Policy 9, requiring an affordable housing mix that is pro-rata that of the proposed market housing mix for the same development, does not reflect national planning policy as it may prevent affordable housing being provided in a mix that reflects the assessed need for it.
- 4.16 This interpretation is substantiated by the affordable housing definition within Annex 2 which requires such housing to be provided only to those households whose ‘needs’ are not met by the market. By necessity this will require that affordable dwellings are provided in sizes that reflect the assessed ‘need’ (as opposed to ‘demand’) for such housing. In contrast, market housing remains undefined in the NPPF, but it is clear that such housing is provided in an environment influenced by household choice and a household’s financial capacity to realise housing preferences as opposed to needs – market housing provided to reflect the minimum dwelling size requirements of households will prove undeliverable where this does not align with the choices households purchasing / renting on the open market will seek to make within the remit of the financial resources available to them.
- 4.17 Where the Council seek to vigorously impose the wording the approach set out in the second sentence of paragraph two in Policy CP9 is likely to result in either an overprovision of larger affordable dwellings than is suggested through objective assessment to be required, or, could lead to the Council seeking the provision of a greater proportion of smaller market dwellings to enable a pro-rata affordable housing mix to be derived which more closely aligns with affordable housing needs.
- 4.18 There is no robust evidence to support that the likely market housing dwelling size demand within Stroud district aligns with affordable housing dwelling size requirements. Currently, the Council refers to the draft Gloucestershire Local Housing Market Assessment (“draft LHNA”) published in October 2019 as forming part of the evidence base for the Local Development Framework (“LDF”).

4.19 The draft LHNA, whilst providing a projected affordable housing mix breakdown for Stroud, only provides a projected market housing mix breakdown at a County level. However, this can be compared as follows:

Table 1 – draft LHNA Housing Mix

	Affordable Housing: Stroud District (Figure 41 draft LHNA)	Affordable Housing Mix: * Gloucestershire (Figure 49 draft LHNA)	Market Housing Mix: Gloucestershire (Figure 49 draft LHNA)
1 bedroom	23%	19%	4%
2 bedrooms	43%	41%	17%
3 bedrooms	24%	30%	55%
4+ bedrooms	10%	10%	24%

*Including households aspiring to home ownership but unable to afford it (there is no assessment of dwelling size mix for 'households aspiring to home ownership' but unable to afford it at a Stroud District level – at the District level the suggested affordable housing mix reflects rented and shared ownership affordable housing need but excludes households able to afford private rented housing solutions without Housing Benefit but unable to purchase on the open market).

4.20 The draft LHNA does not support that affordable housing should be provided in a mix that reflects the market housing mix of a proposed development, as it estimates that 79% of market housing in the Gloucestershire Housing Market Area (the lowest geographical level of analysis provided) is required as three or four bedroom or larger accommodation, compared to an estimated 34% of affordable dwellings across Stroud District.

4.21 It is relevant to note that the draft LHNA modelling in terms of future dwelling size requirements for market and affordable housing are dependent upon the accuracy of household profile projections 20 years into the future, and upon the continuation of current trends in existing inefficiencies and occupation patterns.

4.22 In addition, the draft LHNA (which is yet to be finalised) does not present any sensitivity testing to illustrate the impact where an increasing number of older person owner occupier households seek to remain in their own homes for longer as a result of increased longevity and strategies to support people in their own homes (through adaptations and care packages).

4.23 However, notwithstanding this, the draft LHNA does not support the pro-rata policy approach retained within Core Policy CP9 and which should be deleted as part of this review process.

Third and Fourth Paragraph, Core Policy 9

- 4.24 It is noted that the Council seek to introduce new affordable housing site size thresholds into the wording of Core Policy 9 increasing the site size threshold to 10 or more dwellings (net) / site area of 0.5ha or more except for within Designated Rural Parishes or within the Cotswold Area of Outstanding Natural Beauty for which a 4 or more (net) dwelling threshold is proposed.
- 4.25 Whilst it is welcomed that the Council are seeking to reflect NPPF paragraph 63 there are some concerns about the wording proposed in Core Policy 9. The first issue is that the Council are seeking to secure affordable housing on non-major development sites not only within Designated Rural Areas (as specified to be possible within the NPPF paragraph 63) but also from such sites where these lie within the Cotswold Area of Outstanding Natural Beauty. Paragraph 63 of the NPPF does not propose that local authorities should do this and this requirement should be deleted.
- 4.26 The second issue relates to the wording within Core Policy 9 seeking 'at least' 30% affordable housing. It is impossible to have an understanding of the economic viability or practical impacts of an open ended proposition such as 'at least 30%' affordable housing and this open ended requirement has not been proven to be economically viable. The wording results in a lack of certainty for those seeking to bring land forwards for development as a full understanding of likely policy cost burdens and masterplanning impacts will not be known.
- 4.27 Related to this is a third issue which relates to viability assessment. Even if the wording is adjusted to remove the text 'at least' there is no up to date viability assessment of the impact of seeking 30% affordable housing from eligible sites in the District.
- 4.28 The Council's viability evidence base appears to continue to include a Local Plan Viability Study ("LPVS") prepared by HDH Planning and Development Ltd and published in July 2013, a CIL Viability Study (also prepared by HDH Planning and Development Ltd) and published in January 2014 ("2014 VS"), and most recently a March 2016 CIL Viability Update ("2016 VS"). A more recent assessment is not included in the general evidence base pages on the Council's website or as a document supporting the SDLPR.
- 4.29 As is highlighted in the recent RICS consultation document (Assessing financial viability in planning under the National Planning Policy Framework for England, guidance note, 1st

edition) financial viability assessment should take place primarily at the Plan making stage. On this basis the assessment needs to realistically reflect the full impacts of policy requirements on development. Local Plan reviews should therefore also ensure this part of the Council's evidence base is up to date.

4.30 Extensive feedback was provided to the Council on the various iterations of the viability evidence base, with the last being submitted in June 2016 responding to the 'Stroud District CIL Draft Charging Schedule Consultation, April 2016'. The executive summary of the consultation response submitted set out the following overarching concerns:

- ***The Council's viability evidence base (including the 2016 study which relies on previous assessments) does not robustly demonstrate that 30% affordable housing plus CIL and other s106 contributions (as yet not fully quantified) will be deliverable, particularly on large Greenfield sites in the District.***
- ***Detailed comments submitted on behalf of Robert Hitchins Ltd in response to both the Local Plan and draft CIL process have repeatedly raised concerns regarding the viability and Infrastructure Development Plan evidence base. These concerns are not explored in the examining Local Plan Inspector's report and remain valid concerns that should be addressed in detail as part of the CIL Examination if reasoned conclusions are to be reached.***
- ***The 2016 Viability Study assumes open market value uplifts since 2013 significantly in excess of those suggested by Land Registry sold newbuild house price data for the same period.***
- ***The IDP Oct 2014 acknowledges that not all section 106 costs have yet been determined - therefore these cannot be accurately reflected within the viability evidence base***
- ***There is a continued lack of clarity in the Council's Indicative Draft Regulation 123 List in respect of how s106 obligations and CIL will interact on non-allocated strategic and non-Stroud Valley sites***
- ***The 2016 Viability Study assumption of £1k per dwelling non-affordable housing post CIL s106 costs is completely unreliable – essential / critical infrastructure costs are suggested by the IDP to be likely to exceed £55m (net of CIL and***

allocated strategic site s106 contributions). Given pooling restrictions the Council are likely to focus on non-allocated large Greenfield sites to meet the bulk of these costs through s106.

- *The draft Planning Obligations SPD confirms that an array of s106 obligations will still be sought from sites post CIL. Post CIL s106 costs are likely to be at least £10k per dwelling particularly on large Greenfield sites.*
- *A reliance on artificially high values and artificially low costs combined with a lack of sensitivity testing renders the 2016 Viability Study just as unreliable as its predecessors.*
- *The evidence base fails to review past rates of affordable housing delivery achieved without public subsidy, to inform the monitoring of adopted affordable housing targets and the likely additional pressures that will be placed on sites by the inclusion of the proposed CIL charges.*
- *Data suggests that an average 69% of affordable housing provided over 5 years on Section 106 schemes has been provided with an input of grant funding and an average of just 8% of all housing completions (market and affordable) have been provided without grant on s106 sites.*
- *Ahead of a realistic assessment of viability, given the existing and now adopted Local Plan policy burdens, the delivery of a CIL charge of £80 per square metre on sites outside of the Stroud Valley / non-allocated strategic sites (particularly where these are large greenfield sites) is not robustly demonstrated to be viable. Indeed, at 30% affordable housing a CIL charge of any level is unlikely to be viable on large Greenfield sites (as is already accepted to be the position in respect of the allocated strategic sites). The Council can expect these matters to impact on the overall level of housing delivery and on the ability for applicants to provide the level of affordable housing and infrastructure s106 contributions sought.*

(Source: Response to Stroud District CIL Draft Charging Schedule Consultation, April 2016, prepared by Pioneer Property Services Ltd on behalf of Robert Hitchins Ltd 8th June 2016, see: https://www.stroud.gov.uk/media/3217/all-reps_redacted.pdf pages 59 to 136 for full submission)

- 4.31 Whilst some aspects of the policy and statutory framework have altered since the representations were submitted the key underlying concerns regarding revenue and cost assumptions raised in 2016 remain and were not fully addressed in the examining CIL Inspector's report.
- 4.32 The £1k per unit s106 cost assumption for non-strategic sites (i.e. non allocated windfall sites) included within the 2016 Stroud District CIL Viability Assessment is not considered to be anywhere near enough to cover the s106 cost burdens placed on development.
- 4.33 For strategic sites the 2016 Viability Evidence suggested in Table 4.2 (based on its appendix 4) that s106 costs varied between £4.8k and £17.8k per dwelling – despite that large windfall sites could similarly face significant mitigation requirements only £1k per unit is assumed regardless of site size or current use. In addition to this, the 2016 viability evidence base is now c.3 years old and should be updated as part of the Local Plan Review process.
- 4.34 A review of affordable housing completions data within Live Table 1011 (published by the Ministry of Housing, Communities and Local Government – “MHCLG”) suggests that only 46% of affordable housing has been provided via s106 with nil grant input in Stroud District over the last five years (2014/15 to 2018/19) – see appendix 2 to these representations.
- 4.35 This suggests that, despite the adoption of the Stroud Local Plan in 2015, over half of the affordable housing provision (gross) being achieved is routinely requiring public subsidy to be deliverable. MHCLG Live Table 253 suggests that a total of 1880 new homes (across all tenures) have been completed between 2014/15 to 2018/19 in the District. The nil grant s106 affordable housing completed over this period (295 homes) equates to c.16% of this (see appendix 1 to these representations).
- 4.36 Furthermore, with the deletion of Regulation 123 the 'pooling restriction' on s106 is lifted and s106 and CIL is being increasingly sought for the same infrastructure item. The NPPG states that:

“Authorities can choose to pool funding from different routes to fund the same infrastructure provided that authorities set out in their infrastructure funding statements which infrastructure they expect to fund through the levy.”

(Paragraph: 166 Reference ID: 25-166-20190901)

And:

“...subject to meeting the 3 tests set out in CIL regulation 122, charging authorities can use funds from both the levy and section 106 planning obligations to pay for the same piece of infrastructure regardless of how many planning obligations have already contributed towards an item of infrastructure.”

(Paragraph: 170 Reference ID: 25-170-20190901)

- 4.37 Typically the estimates of site specific section 106 relied upon in plan wide viability assessments fall well short of the per unit levels which are ultimately sought by Councils and County Councils at planning application stage. With the deletion of Regulation 123 such underestimates of cost will be even greater given that almost all viability assessments in recent years including the those supporting the SDLPR assume s106 will be scaled back as a result of CIL.
- 4.38 Under the current CIL Regulations there is no certainty of this scaling back. It is therefore essential that the modelling relies on a realistic assumption to ensure that the modelled outcome does not inadvertently overstate the project viability.
- 4.39 The £1k per unit s106 cost assumption is simply not considered to be enough to cover the s106 cost burdens placed on development, even before the current CIL Regulations (i.e. schemes such as Stonehouse have seen £8.5k per unit s106 costs) which calls into question any prior assumptions of scaling back of s106 costs as a result of CIL.
- 4.40 The recent November 2019 Bishops Cleeve Appeal Decision (reference 3229581) highlights² that the s106 costs that developments are actually likely to be expected to bear could add up to almost c.£18.5k per dwelling. Anecdotal evidence, and the experience of RHL themselves, suggests that local authorities (albeit inappropriately) are similarly seeking hugely increased per unit s106 sums from applicants across sites of various sizes following the Bishops Cleeve decision.
- 4.41 Despite that seeking s106 contributions for items that are not directly related to a development is contrary to CIL Regulation 122, increased s106 sums are essentially being sought predominantly for County wide education infrastructure that should be being funded by appropriately set CIL levels (necessitating a CIL charging schedule review and independent examination).

² Pages 14 - 16

- 4.42 The critical point is that the SDLPR viability evidence base clearly needs to be re-visited and brought up to date with realistic s106 costs taken into account which accurately reflect how s106 costs will interact with CIL.
- 4.43 **Should Stroud District Council seek to follow suit with other Gloucestershire local authorities and seek to impose hugely increased s106 costs (largely it appears as a result of County Council demands) then the impact of this upon plan delivery needs to be re-assessed as a matter of urgency. A failure to do so will render the whole existing Plan and the SDLPR unviable and result in the Council being unable to deliver new homes. Certainly, continuing to seek items such as affordable housing at current and proposed levels will be unlikely to be possible. The reality is that unviable sites will simply not get delivered.**

Fifth Paragraph, Core Policy 9

- 4.44 This paragraph has not been amended and remains as drafted in the 2015 adopted Local Plan. However, whilst the paragraph references negotiation having regard to 'housing needs, site specifics and other factors' there is no specific reference to having regard to viability.
- 4.45 Given the lack of an up to date viability assessment (in line with current national policy and guidance requirements) site level viability will clearly be a crucial factor to take into account when agreeing the approach to affordable housing provision on sites and the Policy wording should reflect this.
- 4.46 Furthermore, there is no reference within Core Policy CP9 to the negotiation of the proportion of affordable housing to be provided. The possibility of negotiation in respect of the proportion of affordable housing to be provided is therefore excluded by the wording of Core Policy CP9.
- 4.47 It is of significant concern that the viability evidence base to which the Council refers and which it is assumed that the Council will draw on during negotiations is unreliable and has not been updated.
- 4.48 It is agreed that any future affordable housing provision should be arrived at through a process of negotiation. In particular, it would be inappropriate if the Council were to seek to impose requirements (including through supplementary planning documents) for affordable housing when assessing development proposals on the basis of evidence and conclusions

which are not based on an up to date assessment of overall housing requirements and viability.

- 4.49 A lack of opportunity to negotiate the affordable housing proportion represents a problem, as, where there is no ceiling on the target the reader a) will be uncertain as to an appropriate maximum level of affordable housing that should be proposed, and b) will technically be unable by virtue of the wording from being able to enter into negotiation with the Council as to the proportion (which could exceed 30% under the current wording) to be provided.

Core Policy 9 Proposed Modifications

- i) The first paragraph of Core Policy CP9 should be amended as follows:

“There is The Gloucestershire Local Housing Needs Assessment suggests an overall unadjusted need for affordable housing in Stroud District of 344 425 dwellings per annum of which 73% of households require a subsidised route to home ownership.”

- ii) The latter half of the second sentence in the second paragraph of Core Policy CP9 should be amended as follows:

“Affordable housing should broadly reflect the sizes, tenures and types that meet the proven needs of people whose needs are not met by the market who are not able to compete in the general housing market as well as reflecting the dwelling sizes and design in the proposed development.”

- iii) The reference to the Cotswold Area of Outstanding Natural Beauty should be deleted from the start of the third paragraph in Policy CP9.

At minimum the words ‘at least’ should be deleted from paragraphs three and four, but the primary preference is that the affordable housing proportion itself should only be proposed once the Council are in a position to have reference to up to date robust viability evidence prior to setting the affordable housing proportion sought.

- iv) The wording of the final paragraph in Core Policy CP9 should be amended as follows:

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

- v) These suggested amendments should be considered in light of the conclusion of these representations that Policy CP9 is, as a whole, unsound as a result of the lack of up to date viability evidence to support / the lack of clarity on the affordable housing proportion sought and the issues with the wording around housing mix. However, the proposed amendments will assist should the Council determine deliverable and justifiable affordable housing proportion for inclusion within a replacement affordable housing policy.

5 Delivery Policy HC3 Self-build and Custom Build Housing Provision

- 5.1 There is no basis for imposing an obligation on applicants for self / custom build plots within national policy or the underlying legislation. The NPPF clarifies that:

“Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.”

(footnote 26, page 17, NPPF)

- 5.2 There is no basis in the legislation or within national policy for imposing an obligation on applicants (of any size site) to hive off a section of their site to be sold as self-build plots – it is the Council’s responsibility, not that of a land owner or developer, to ensure that sufficient permissions are given to meet demand.
- 5.3 In other words, the legislation is not worded in such a way that it empowers local authorities to place restrictions on the use of land to deliver self-build units. The wording enables local authorities to permit the use of suitable land for this purpose, as opposed to restricting it to be used for this purpose.
- 5.4 The NPPG further supports this interpretation:

“Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include:

- developing policies in their Local Plan for self-build and custom housebuilding;*
- using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;*
- engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and*
- working with custom build developers to maximise opportunities for self-build and custom housebuilding.”*

(Paragraph: 025 Reference ID: 57-025-201760728, 28 July 2017)

5.5 The NPPG also advises that:

“Local housing authorities who are under the duty to have regard to registers that relate to their areas should consider the evidence of demand for self-build and custom housebuilding from the registers when carrying out their housing functions. This includes when preparing their local housing strategies and in developing plans for new housing on land owned by the local housing authority.”

And:

“Authorities who are under the duty to have regard to registers that relate to their areas should consider the evidence of demand for self-build and custom housebuilding in their area from the register when developing plans to dispose of land within their ownership.”

(Paragraph: 014 Reference ID: 57-014-20170728, 28 July 2017 – emphasis added)

5.6 Whilst local authorities can develop policies in Plans for self-build and custom housebuilding, there is nothing in national guidance, national policy or in the legislation to suggest that such policies should place the obligation on land owners or developers to deliver self-build / custom-build plots; the wording in the NPPG specifically refers to ‘encouraging’ land owners if they are ‘interested’. However, it is specifically stated in the NPPG that local authorities should make their own land available for this use. On this basis

policy wording could encourage, but not require the provision of such plots within new development.

- 5.7 Notwithstanding that there is no policy or legislative basis for imposing this obligation through Plan policy, where a planning obligation is imposed it will have to accord with the CIL Regulation 122 and the NPPF paragraph 56 tests. Therefore, if local authorities seek to place a restriction on the use of land to set it aside for self-build plots through the means of a planning obligation then this will have to be demonstrated to be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. If a need for the type of plots that would be available (i.e. based on size location and context) on a proposed development is not demonstrated then the tests cannot be met.
- 5.8 Clear evidence supporting the need to include this as a policy requirement is not provided by the Council. Simply referring to a waiting list of households on the self- / custom-build register, whilst relevant to the Council in determining their own obligation to permit a specific number of such plot applications, will not be sufficient to pass the tests applicable to the imposition of planning obligations or to justify the inclusion of policies to impose such planning obligations.
- 5.9 Simply referring to the crude register data will fail to reflect the net demand specifically for plots on strategic sites having regard to i) the location and context preferences of the applicants and ii) the existing availability / supply of such plots within the local authority area.
- 5.10 It is noted that the Gloucestershire draft Local Housing Needs Assessment 2019 (“draft LHNA19”) includes a section on ‘People wishing to Build their Own Homes’ (pages 76-78). However, this simply sets out the numbers of households on the Self-Build Registers in the local authorities in Gloucestershire; it provides no evidence to justify the inclusion of new policy requiring a proportion of self / custom build plots on strategic sites or any other residential developments on privately owned land.
- 5.11 The draft LHNA19 Figure 53 suggests a cumulative total of 166 households have registered on the self-build register in Stroud District. However, the majority of these registered in 2016/17 with the registrations falling significantly after this date (to 2 households in 2017/18 and, provisionally, to 4 households in 2018/19) coinciding with the introduction of registration charges. The draft LHNA19 does not identify how many of these households

have a local connection or are individuals / small groups as opposed to commercial developers using the registration system (paragraphs 9.44 to 9.45).

- 5.12 It is unclear whether or not any of the applicants have already resolved their requirement or decided not to pursue a self-build option (i.e. the local authority thereby having been absolved of their responsibility to provide a permission to meet that applicant's demand) through any kind of attempt by the Council to review the register.
- 5.13 The information within the draft LHNA19 provides only headline numbers, with apparently no additional information sought from applicants on the location and context in which they want a plot. Whilst headline level of information may be sufficient for the Council to determine their overall numerical obligations in terms of the numbers of such permissions they should grant, it is not sufficient to demonstrate that a supply of such plots can legitimately be sought through planning obligations / the introduction of Plan policy. There is no indication of a demand from these applicants to obtain a plot within part of a larger development.
- 5.14 National guidance sets out that local authorities have 3 years in which to permit sufficient plots to meet demand from within each base period (i.e. a base period runs on an annual basis from 31 Oct to 30 Oct). Stroud District's performance in this respect is not identified in the draft LHNA19 – this is central to understanding the extent of any unmet demand.
- 5.15 It is not identified within the information provided in the draft LHNA19 how many applications for self-build dwellings have been made and refused by the Council. The criteria upon which any such successful applications have been assessed to be self-build or custom build applications is also not explained – a recent appeal decision (reference 3214498) clarifies that s106 Agreements containing provisions to ensure proposed dwellings meet the legal definitions of self-build / custom build enable such proposals to be identified as a compliant supply source.
- 5.16 Falling short of the number of permissions required to address demand on the register is not a robust justification for the imposition of blanket policy requirements for such plots to be provided from privately owned housing sites – the 'duty to grant planning permission' imposed by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) lies with local authorities; not with landowners.

5.17 In a recent appeal decision in respect of a self-build application refused by a Leicestershire local authority the Inspector stated:

“I accept that the NPPG on Self-Build and Custom Housebuilding states that relevant authorities could include policies in their local plans for self and custom housebuilding, but this is not a requirement. It also states that relevant authorities could seek to meet demand by engaging with landowners who own sites that are suitable for housing. The only requirement is that the Council has a duty to grant planning permission for enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area.”

(Appeal reference APP/G2435/W/18/3214451 & APP/G2435/Q/18/3214498, paragraph 27, 25 June 2019, emphasis added)

This supports that national guidance does not include a requirement for self-build plots to be imposed through Plan policy or upon landowners – the duty is placed upon the local authority alone.

5.18 The NPPG provides further information on self and custom build and sets out that:

“Local planning authorities should use the demand data from the registers in their area, supported as necessary by additional data from secondary sources (as outlined in the housing and economic development needs guidance), when preparing their Strategic Housing Market Assessment to understand and consider future need for this type of housing in their area. Plan-makers will need to make reasonable assumptions using the data on their register to avoid double-counting households.”

(Paragraph: 011 Reference ID: 57-011-20160401, NPPG)

5.19 An assessment of potential publicly owned land that could be used to provide self-build plots is not presented in the Council’s evidence base. Indeed, there is no clear evidence of the Council having considered other reasonable approaches to delivery in line with those suggested by the NPPG. In the absence of this the Council appears to be seeking to place the burden of its duty to enable permissions for delivery of sufficient self-build plots onto house-builders without looking sufficiently at alternative approaches in line with national guidance.

- 5.20 The evidence currently available to the Council does not justify the inclusion or retention of policy wording requiring a proportion of self / custom build plots – all that any policy should state is that the provision will be ‘encouraged’ otherwise the whole policy should be deleted.
- 5.21 This latter reflects the recent conclusion of the examining Inspector to Broxtowe Borough Council’s Local Plan where the local authority had similarly not presented evidence to justify the inclusion of a self-build policy (Inspector’s report for Broxtowe Borough Council Part 2 Local Plan, paragraph 158, 7 October 2019). In a post hearing advice note the examining Inspector stated:

“I have noted the Council’s proposed post hearing revision to Part 8 of the Policy. This removes the 5% requirement for custom and self-build homes on schemes of 20 dwellings or more; the requirement to be based instead on meeting an existing demand indicated by the Register. I am not satisfied however, that based on the available evidence including the lack of permissions for custom build/self-build homes in the Borough, that there is sufficient demand for such provision. The requirement is therefore unjustified. I suggest that Part 8 of the policy be deleted.”

(Broxtowe Local Plan Part 2, Examining Inspector Post Hearing Advice Note, paragraph 16, March 2019)

As such, it was insufficient for the wording to be altered to remove a target percentage (in the absence of sufficient evidence to set one) and to be replaced by provision based on the register as and when a site application proposal was being considered.

- 5.22 In addition to the above concerns, the wording of Policy HC3 also lacks clarity in terms of how the policy is to be applied in practice contrary to paragraph 16 of the NPPF - ‘a minimum of’ suggests any amount exceeding ‘2%’ could be sought by the Council.
- 5.23 There is no indication of what happens if the proportion of plots required by the Council fail to sell; can they be built out and sold by the developer and if so at what point? Who will carry the cost of any marketing activities (there is nothing in national policy suggesting that the marketing of such dwellings is the responsibility of housing development applicants, particularly when it is the Council who is able to charge fees to maintain the register for such plots). The policy wording should include flexibility for such matters to be agreed between the applicant and the Council.

- 5.24 There is no robust consideration within the viability assessments in the Council's evidence base of the potential impacts of seeking any self-build / custom build contribution from development (not only in terms of plot sale values but also in terms of marketing, masterplanning, timing and any other specific delivery costs).
- 5.25 It is impossible to have an understanding of the economic viability or practical impacts of an open ended proposition such as 'a minimum of 2%' and the proposal has not been robustly viability tested or thought through in terms of the mechanisms that would be used to secure it. Not only is there no justification in national planning policy for this policy requirement, the wording results in a lack of certainty for those seeking to bring strategic land forwards for development as a full understanding of likely policy cost burdens and masterplanning impacts will not be possible.

Delivery Policy HC3 Proposed Modifications

- i) The wording of Delivery Policy HC3 should either be deleted in its entirety or be amended as follows to make it clear the Council will not impose a requirement for plots upon development proposals:

"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. 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~~ the Council will encourage development proposals which provide plots suitable for self- or custom-build in order to meet Government aspirations to increase self build developments, subject to appropriate demand being identified. In determining the nature and scale of any provision, the Council will have regard to site-specific circumstances and local demand.

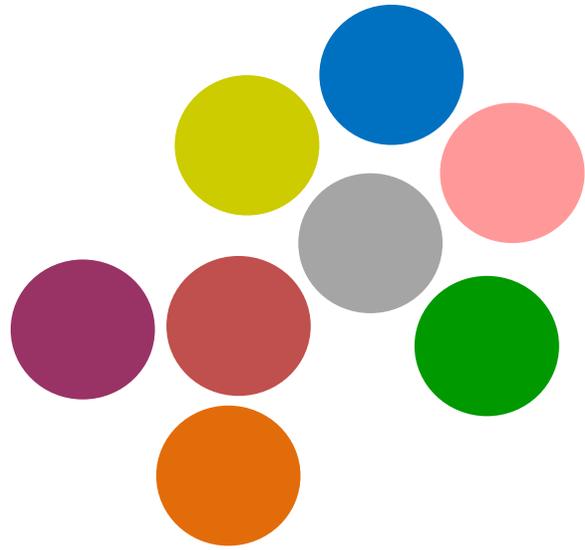
All self build and custom build schemes will:

- 1. be individually designed and bespoke to that household, employing innovative approaches throughout that cater for changing lifetime needs***
- 2. provide appropriate linkages to infrastructure and day to day facilities***

3. Include a design framework, agreed with the Council and submitted with the full or reserved matters planning application for the wider site, to inform detailed design of the individual units and the mechanisms for the delivery of self build and custom build plots, where more than one self build unit is proposed

4. satisfy the detailed criteria defined for meeting housing need at settlements.”

6 Appendix 1



Stroud District Local Plan Review

Draft Plan for Consultation

November 2019



Core Policies

- 4.1 These policies sit at the heart of the Plan. They are the principal means of delivering the Plan’s strategic objective of nurturing accessible, healthy and inclusive communities across the District (**SO1, SO1a**), as well as meeting the District’s housing needs in the most sustainable way.
- 4.2 The Draft Plan includes some new polices and changes are proposed to some of the policies in the **current Local Plan**. The following pages set out the draft wording, and identify where and why any changes are proposed. Supporting and explanatory text will be developed to accompany the final policies in the **Pre-submission Local Plan** (anticipated Autumn 2020) and will be subject to public consultation at that point.

* NEW * Core Policy DCP2

- 4.3 This new policy addresses the aims of proposed new strategic objective **SO1a**, which seeks to develop healthy, inclusive and safe communities:

* NEW * Core Policy DCP2

Supporting Older People

Initiatives and developments will be supported which:

1. Enable older people to live independently in their own home;
2. Increase the range of available housing options with care and support services in accessible locations;
3. Promote active lifestyles;
4. Increase older people’s engagement in community life, including through “hubs”.

Achieving healthy and inclusive communities

Summary of proposed changes to Core Policy CP7:

- 4.4 There are no proposed changes to this policy:

Core Policy CP7

Lifetime communities

To ensure that new housing development contributes to the provision of sustainable and inclusive communities (including the provision of community facilities) in the District, developers will need to clearly demonstrate how major housing development will contribute to meeting identified long term needs in those communities the development relates to. Proposals will need to demonstrate how the following needs have been taken into account:

1. An ageing population, particularly in terms of design, accessibility, health and wellbeing service co-ordination
2. Children, young people and families
3. People with special needs, including those with a physical, sensory or learning disability, dementia, or problems accessing services and
4. The specific identified needs of minority groups in the District.

Proposals will need to demonstrate how the factors below have informed the development proposal:

- A. Lifetime accommodation
- B. Contribution to meeting the needs of those with an existing long standing family, educational or employment connection to the area.



New housing development

Summary of proposed changes to Core Policy CP8:

- 4.5 Proposed changes strengthen the need for major sites to broadly match the size, type and tenure of housing identified as needed within the Local Housing Needs Assessment.

Core Policy CP8

New housing development

New housing development must be well designed to address local housing needs, incorporating a range of different types, tenures and sizes of housing, to create mixed communities. New developments should take account of the District's housing needs, as set out in the Local Housing Needs Assessment. In particular, on major sites, the expectation will be that the range of types, tenures and sizes should reflect the housing needs identified for that Parish Cluster area.

Residential development proposals will need to:

1. Be built at an appropriate density that is acceptable in townscape, local environment, character and amenity terms
2. Have a layout that supports accessibility by bus, bicycle and foot to shopping and employment opportunities, key services and community facilities or contribute towards provision of new sustainable transport infrastructure to serve the area
3. Have a design, layout, access, parking, landscaping and community facilities that are appropriate to the site and its surroundings
4. Use sustainable construction techniques and provide renewable or low carbon energy sources in association with the proposed development and
5. Enable provision of infrastructure in ways consistent with cutting greenhouse gas emissions and adapting to climate change and its

consequences.

Major residential development proposals will be expected to enhance biodiversity on site and, where appropriate, through a network of multi-functional green spaces, which support the natural and ecological processes.

Affordable housing

Summary of proposed changes to Core Policy CP9:

- 4.6 Proposed changes reflect the thresholds set out in the NPPF, the designation of rural parishes within the District and the results of the Local Housing Needs Assessment.

Core Policy CP9

Affordable housing

There is an overall unadjusted need for affordable housing of 425 dwellings per annum.

Planning permission will be granted for residential (including extra care) development providing an appropriate density that is acceptable in townscape, local environment, character and amenity terms, dwelling types, tenures and sizes seamlessly integrated with existing development or proposed mixed-use development. Affordable housing should broadly reflect the sizes and types that meet the proven needs of people who are not able to compete in the general housing market as well as reflecting the dwelling sizes and design in the proposed development.

Within the Cotswolds Area of Outstanding Natural Beauty 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 and Stone, Hamfallow, Harescombe, Haresfield, Hillesley and Tresham, Hinton, Horsley, Kingswood, Longney and Epney, Miserden, Moreton Valance, North Nibley, Nymphsfield,



Painswick, Pitchcombe, Slimbridge, Standish, Stinchcombe, Uley and Whitminster, sites capable of providing 4 or more dwellings (net) will be required to provide at least 30% affordable housing.

In all other areas, sites capable of providing 10 or more dwellings (net), or covering a site area of 0.5 hectares or more, will be required to provide at least 30% affordable housing

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.

maintained throughout the lifetime of the Local Plan by adopting the following sequential approach:

1. First preference will be to include additional pitches /plots within the boundaries of existing suitable sites
2. Second preference will be to extend existing suitable sites
3. Only where a sufficient supply of additional pitches or plots cannot be achieved through sustainable development at the above locations should new sites be identified.

If the need cannot be met at any existing suitable site the following location criteria will apply:

- A. The proposal will not have an adverse impact on neighbouring residential amenity or other land uses
- B. The site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network
- C. The site is situated in a suitable location in terms of local amenities and services including schools, shops, health services, libraries and other community facilities
- D. The site is capable of providing adequate on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage
- E. The site will enable vehicle movements, parking and servicing to take place, having regard to the number of pitches/plots and their requirements as well as enabling access for service and emergency vehicles
- F. The site is not situated within an unacceptable flood risk area.

Gypsies, Travellers and Travelling Showpeople

Summary of proposed changes to Core Policy CP10:

- 4.7 Proposed changes reflect the requirements for pitches and plots identified in the Gypsy and Traveller Accommodation Assessment.

Core Policy CP10

Gypsy, Traveller and Travelling Showpeople Sites

The Council will safeguard existing authorised sites for Gypsy, Traveller and Travelling Showpeople uses provided there remains a need for these uses within the District.

A locally set target of up to 7 additional pitches is identified to meet Gypsy and Traveller residential needs from 2016 to 2031. A locally set target of 8 to 12 additional plots is also identified to meet Travelling Showpeople residential needs from 2016 to 2031.

The Council will ensure that a five years' supply of specific deliverable sites is



Summary of proposed changes to Delivery Policy HC2:

4.11 There are no proposed changes to this policy:

Delivery Policy HC2

Providing new homes above shops in our town centres

Proposals to use the upper floors above shops and offices in identified town and local centres for residential use (three units or more) will be permitted where this does not threaten the continued ground floor commercial use or the vitality of the town centre.

Summary of proposed changes to Delivery Policy HC3:

4.12 Proposed changes broaden the policy support for self build and custom build dwellings and strengthen the policy requirement for good design:

Delivery Policy HC3

Self-build and custom build housing provision

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. 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. In determining the nature and scale of any provision, the Council will have regard to site-specific circumstances and local demand.

All schemes will:

1. be individually designed and bespoke to that household, employing innovative approaches throughout that cater for changing lifetime

needs

2. provide appropriate linkages to infrastructure and day to day facilities
3. Include a design framework, submitted with the full or reserved matters planning application for the wider site, to inform detailed design of the individual units, where more than one self build unit is proposed
4. satisfy the detailed criteria defined for meeting housing need at settlements.

Summary of proposed changes to Delivery Policy HC4:

4.13 Proposed changes reflect the NPPF support for entry level homes, self build and custom build homes and some market housing on rural exception sites in certain circumstances. Other changes update references to Homes England and set size requirements for affordable self build and custom build dwellings to meet needs:

Delivery Policy HC4

Local housing need (exception sites)

Planning permission may be granted for affordable housing, including entry level homes, and single plot self-build or custom build affordable dwellings on sites well related to existing settlements. Such sites should be located close to, or adjoining, an accessible settlement with local facilities ('Third Tier') or above in terms of the Plan settlement hierarchy, unless specific local need and environmental considerations indicate that provision should be met at fourth tier settlements. The Council shall meet local affordable housing need, where:

1. the Council is satisfied that there is a clearly evidenced local need, which cannot be readily met elsewhere in the locality, for the number and type of housing proposed



7 Appendix 2

Region name	(All)	▼
District name	(All)	▼
Metropolitan name	(All)	▼
LA name	Stroud	▼
LA name 201819	(All)	▼
Type	(All)	▼

Please select the geography you require from the drop down menu.

- LA name = local authority borders at the time data was reported

- LA name 201819 = 2018-19 local authority borders

Footnotes:

See Notes tab

Please select whether you want NB, Acquisition or Unknown.

Sum of Units	Column Labels					
Row Labels	2014-15	2015-16	2016-17	2017-18	2018-19	Grand Total
Social Rent	46	10	5	19	80	
Local Authority HE/GLA funded	7	10	1		18	
Local Authority other funding	19		4	3	26	
s106 nil grant		20			16	36
Affordable Rent	89	46	101	95	46	377
Private Registered Provider HE/GLA funded	58			37	10	105
Affordable Homes Guarantees		10	38			48
Local Authority HE/GLA funded		19	49	13		81
Local Authority other funding				16		16
s106 nil grant	31	17	14	29	36	127
Shared Ownership	25		24	32	47	128
Private Registered Provider HE/GLA funded	19			4		23
Local Authority HE/GLA funded			14	5		19
s106 nil grant	6		10	23	47	86
Affordable Home Ownership	20	32			4	56
Private Registered Provider HE/GLA funded	1					1
Local Authority other funding		9				9
s106 nil grant	19	23			4	46
Grand Total	134	124	135	132	116	641

s106 nil grant 295 46%

Cover Sheet	Contents	Notes	1011C	1011S	+
-------------	----------	-------	-------	-------	---

Table 253 Housebuilding: permanent dwellings started and completed, by tenure and district.

DCLG code	Former ONS code	Current ONS code	Met and Shire County Totals	Lower and Single Tier Authority Data	Dwellings started				Dwellings completed			
					Private Enterprise	Housing Associations	Local Authority	All	Private Enterprise	Housing Associations	Local Authority	All
2014/15	C1625	23UF	E07000082	Stroud	310	30	10	360	390	50	0	440
2015/16	C1625	23UF	E07000082	Stroud	150	20	70	240	330	40	20	390
2016/17	C1625	23UF	E07000082	Stroud	270	80	40	390	160	60	50	260
2017/18	C1625	23UF	E07000082	Stroud	380	70	0	460	260	50	20	330
2018/19	C1625	23UF	E07000082	Stroud	540	140	0	690	380	80	0	460

1,880