



Sent by EMAIL ONLY to info@strategiclocalplan.org

12/3/2024

Dear Sir/ Madam

Response by the Home Builders Federation to the Public Consultation: Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan, Issues and Options: Spatial Options and key policy areas, Feb - March 2024

1. Please find attached the Home Builders Federation (HBF) response to the Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan, Issues and Options Consultation. HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. HBF have not responded to every consultation question only those of relevance to our members.

Future Engagement

3. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
4. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully

R. H. Danemann

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If you would like to be added to a database, to be notified about the SLP and other planning policy matters from the councils, please provide your details below. The privacy statement is available to view on the SLP website.

If possible, please provide an email address as this allows the councils to notify in a more efficient and cost-effective way.

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Other than the SLP, are you interested to hear about more local planning policy matters in?	
Cheltenham Borough?	Yes
Gloucester City?	Yes
Tewkesbury Borough?	Yes

Consultation questions

Strategic and Local Plan

1. How far into the future should the Strategic and Local Plan cover?

The NPPF (2003, para 22) states that strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.

HBF would therefore request that the Council ensures that the Plan period will cover at least the 15-year period is provided post adoption of the Plan as required. HBF also note that it can take a long time for Plans to progress from Issues and Options through Reg 18 and Reg 19 consultation, the Submission and Examination of the Plan, the Inspector's Report and then the formal adoption, by the three constituent authorities.

In light of the amount of time it can take to progress through the multiple stages of plan-making, a realistic timetable for the preparation of the SLP is essential. This must be realistic, and HBF suggest including a contingency within that timetable would also be sensible. Whatever plan period is chosen there is a need for evidence to cover the whole plan period, it would therefore be sensible to ensure the evidence covers a longer time frame as well.

The draft vision refers to 2041 and beyond, we would suggest beyond 2043 may be a more sensible approach.

2. Are there any strategic policy topics, not identified above (paragraph 2.4), which should also be considered?

HBF note the NPPF requirement for 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

- (a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- (b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- (c) community facilities (such as health, education and cultural infrastructure; and
- (d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change and adaptation.'

We would agree that the SLP should oversee these items as a minimum. HBF would suggest there is a need to consider whether there are any cross-boundary strategic issues, and/or infrastructure needs, that exist with the neighbouring authorities that border the SLP three partners areas, which the SLP would need to address in a strategic manner.

In light of the housing crisis and the need for housing need to be met in full, HBF would suggest the Plan may need to consider the need for a Green Belt review and green belt releases of land for housing, and possibly other uses. It would be logical for this to be addressed in a strategic manner. It is important that the Plan takes decisions about the most appropriate place(s) for new development and provides a clear direction moving forward.

HBF would also suggest that the delivery of Biodiversity Net Gain may be a strategic issues (see our comments later in this response) that needs to be addressed.

3. What local policy topics are unique to only a council area, neighbourhood or community?

HBF is not aware of any locally specific issues that would need be addressed in only one council area. However, there will clearly be a need for the housing need of the three-authority area to be met within their respective areas and monitored on that basis. This would seem to be particularly important in relation to the issue of specialist housing, and self and custom build. HBF would also argue there is a need for additional housing to meet the growth aspiration of the area and wider regional housing needs. Such housing would not necessarily need to be restricted to location within one of three LPA areas of the SLP.

Draft Vision and Strategic Objectives

4. Do you agree with the draft Vision?

(a) **If not, what changes would you like to see?**

The Plan will need to deliver a range of housing sites providing a range of housing types, sizes and tenures. This will need to include a full range of housing including the family housing. HBF considers that it is appropriate for the Council to identify housing, and the maintenance of the five-year supply as an objective for the Plan. Meeting housing need in full should also be a key objective of the Local Plan.

HBF also suggest that Plan will also need to recognise that there will be a possible tension between policies that seeks a maximise housing density and policies seeking to meet the full range of housing needed necessitating a range of new housing types, scale and design.

5. Do you agree with the draft Strategic Objectives?

(a) **If not, what changes would you like to see?**

HBF agree that it will be important for the Plan to deliver a wide choice of homes that meet the needs of our communities. HBF support the need for the Plan to delivering sufficient new homes in the right places to meet the needs of the communities, including market and affordable, specialist homes (e.g. older persons), Gypsy, Travellers and Travelling Showpeople and those wishing to build their own homes (self and custom build homes). We welcome the recognition of the important role market housing has to play in delivering this ambition.

HBF also support the ambition to delivering housing of the right size, type and tenure to create mixed and balanced communities, in sustainable locations and with good access to shops, services and facilities. However, the policy ask must be considered in the round to ensure development remains viable. HBF considers that it is appropriate for the Council to explicitly identify meeting housing needs in full, and the maintenance of the five-year supply as an objective for the Plan.

Planning for climate change and nature recovery

6. In what ways do you consider the Strategic and Local Plan can most effectively address the impacts of climate change?

As discussed in more detail in response to Question 7, HBF is very concerned about the proliferation of climate change and energy policies that seek to go further and faster than national policy changes that result in patchwork of differing local standards. There is simply no need for Local Plans to include policies on matters already adequately addressed through Building Regulations, other consenting regimes and other regulations.

7. What measures and standards should the Strategic and Local Plan introduce in respect of the:

(a) Construction and operation of new buildings?

(b) Retention and reuse of existing buildings?

Although the HBF is very supportive of the role that Local Plans can play in helping to address and mitigate the impact of climate change. HBF is very concerned about the proliferation of climate change and energy policies that are being suggested in some emerging Local Plans. HBF would caution against policies that seek to go further and faster than national policy changes that result in patchwork of differing local standards.

There is simply no need for Local Plans to include policies on matters already adequately addressed through Building Regulations, other consenting regimes and other regulations. Doing so creates confusion, duplication, misunderstandings, misalignments and sometime full out policy conflicts, which do nothing to help secure the environmental benefits that communities and developers are seeking to achieve.

For example, HBF note that the current Part G Building Regulations requires developments to compliance with a limit of 125 litres per day. House builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. There is therefore no need for a water efficiency policy in a Local Plan.

Similarly, HBF is concerned about any policies which mandate connections to district heating networks. Heat networks are one aspect of the path towards decarbonising heat, however, currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired.

As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost.

The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered. If the policy were to be pursued HBF considers any such requirement must be implemented on a flexible basis.

The Government consultation on Heat Network Zoning also identifies exemptions to proposals for requirements for connections to a heat network these include where a connection may lead to sub-optimal outcomes, or distance from the network connection points and impacts on consumers bills and affordability.

Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies.

8. Should the Strategic and Local Plan require more than the mandatory minimum 10% Biodiversity Net Gain through development?

It is the HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. It is important that BNG does not prevent, delay or reduce housing delivery. Although the national policies requiring 10% BNG cannot be subject to site specific viability discussion, any policy requirements over 10% can be. Any policy seeking more than 10% BNG needs to reflect this position.

In light of all the new guidance on BNG that has recently been published, the Council will need to ensure its approach to BNG to ensure it fully reflects all the new legislation, national policy and guidance.

HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time and note the final version of DEFRA BNG Guidance was published on 12th Feb 2024 and the final version of the PPG published on Feb 14th 2024. HBF understand that both may be further refined once mandatory BNG is working in practice, to reflect any early lessons learnt.

HBF note that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy so that it complies with the latest policy and guidance as it is finalised. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance.

It is also important to note that large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase. The BNG PPG has been since its draft version to provide additional advice on phased development.

HBF also suggest particular care is needed in terminology to ensure the BNG policy reflects the national policy and guidance. For example, on-site and off-site biodiversity is referred to as units, and the statutory national credit system of last resort is referred to as credit. Similarly, it will be important to differentiate between the mitigation hierarchy, which seeks to avoid harm and then mitigate it in relation to protected habitats and the BNG hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. National BNG policy allows for all three of these options, and therefore the Plan should also reference statutory credits.

The costs of BNG must also be considered as part of the whole plan viability assessment and should be specified as a single specific item, not combined into a generic s106 costs item. There are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. As this is an emerging policy area and the market for off-site provision, and statutory credits are not yet known, any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. The Whole Plan Viability Assessment should clearly set out how it considered the implications of mandatory BNG and how it was arrived at using the most up to date BNG costs information available.

HBF suggest that there will also be a need for SLP to explain how it links into the emerging Local Nature Recovery Strategies. Although these are new initiative, and one has yet to be prepared that covers Cheltenham, Gloucester and Tewkesbury, the LNRS will be an important part of setting a spatial strategy for Nature. As such, as the LNRS emerges it will be important for this Local Plan to be kept under review and further public consultation on the interaction between the two documents and/or changes to Local Plan policy to reflect the LNRS may be needed.

HBF would encourage the Council to ensure the Local Plan fully considers and evidence how BNG has formed part of the site selection process. This should include understanding the BNG requirement, including undertaking an assessment of the baseline to support the allocation. Understand the BNG costs and viability for the site and considering how this may impact other policy requirements such as affordable housing, other s106 or CIL contributions.

HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG delivery hierarchy (which avoids loss to start with, but then prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the Reg 19 Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims. We would suggest the use of the term “BNG spatial hierarchy” may help with this issue.

Reference could also usefully be made within the Plan to the small sites metric. This is intended to be a less complex statutory metric that can be used to set out how 10% BNG will be secured on small sites. It can only be used for on-site BNG delivery. The national mandatory 10% BNG policy will apply to small sites from April 2024.

9. Are you aware of any land that could be identified for environmental purposes, such as wildlife / biodiversity net gain, recreation, flood risk mitigation, cooling and shading, carbon storage and food production?

HBF does not comment on specific sites or potential allocations, but we would request the Plan actively considered the issue of stacking in relation to BNG, SANGS, carbon sequestration and other relevant issues and policy in this area is developed.

10. Which key services and facilities do you think are most important to be provided within easy reach of developments?

The Plan will need to set out a spatial strategy that directs new development to the most sustainable locations. In light of the scale of housing need HBF suggest that this will need to include a range of sites reflecting the settlement hierarchy. It will be important for development to be located in accordance with the settlement hierarchy and a range of allocations that meet a range of housing need provided.

The NPPF encourages plans to look 30 years into the future when setting a long-term vision for their area. Paragraph 22 requires that “strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger-

scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery". HBF would encourage the Councils to use this new joint Local Plan as a way of setting a clear direction for the future development of the area.

If the Councils intend to develop any new settlement(s) and/or significant SUEs as one of the ways to meet their housing need, this decision should be taken now. It can take many years if not decades for a new settlement to be delivered. Whilst SUEs can be expected to deliver more quickly than new settlements they also take time, and as such would make a contribution to housing land supply later in the plan period. It will be important to be realistic about the timeframes that it will take to deliver a new settlement and/or SUEs so that any assumptions about the contribution of this approach to the land supply of this Plan are realistic. It will be important for the Plan to acknowledge, if a new community is needed it will take time for it to be worked up and developed. The Local Plan should make clear decisions to ensure it provides the certainty the development industry and local communities need.

In order to secure an ongoing supply of deliverable sites it will be important for a range of sites to be provided including sites that can be developed in the short and medium terms, as well as taking longer term decisions.

**11. Should we allocate sites in the SLP specifically for renewable energy generation or storage?
(a) If so, what forms of renewable energy would be appropriate and in which locations?**

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Planning for communities and business

**12. Should the Strategic and Local Plan use the local annual housing need calculation from the Standard Method?
(a) If no, please set out what you consider the councils should use instead.**

The NPPF requires the standard method to be used unless exceptional circumstances justify an alternative approach. In HBF's view there are no exceptional circumstances which would warrant a different approach than the standard method being used as the starting point for considering the housing requirements for the Cheltenham, Gloucester and Tewkesbury SLP.

The Government has made it clear that it still supports the national target of 300,000 new homes per year. The standard method housing requirement has always been only the starting point for setting the housing requirement in a Plan.

Para 61 of the newly revised (Dec 2023) NPPF says 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. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area". Para 67 states that "The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment."

HBF strongly support the need for more housing in the Cheltenham, Gloucester and Tewkesbury SLP for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support

employment growth. HBF would request that the Council considers the proposed housing requirement fully considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing.

13. Are there any constraints or other reasons why the number of houses to be actually planned for in the Strategic and Local Plan should differ from calculated needs?

HBF suggest there are no reasons for the housing requirement to be constrained. In fact, for the reasons listed above HBF would argue that the housing requirement should be higher.

HBF would also encourage the Council to take a broader view of the role of its Plan. The new SLP must not be prepared in isolation. HBF is very aware of the housing challenges facing the Bristol City Region, especially since the collapse of the WECA strategic planning. To avoid similar issues be failing North Gloucestershire HBF would suggest that SLP should be developed with input from the neighbouring LPAs in northern Gloucestershire and the Plan may need to be proactive in supporting growth and development of the Region. This necessitates planning for a higher number of much needed homes.

The NPPF (para 70) also requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.

The Councils' should therefore set out in the SLP's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by the NPPF. Indeed, the HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.

**14. Are there any specific types, sizes or tenures of housing that the SLP should require for particular groups in the community?
(a) If so, please explain further.**

HBF are supportive of the need for new homes. The Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice and a buffer to ensure that housing needs are met in full. The Plan will also need to deliver a range of housing sites providing a range of housing types, sizes and tenures. This will need to include a full range of housing including the family housing. The Plan will also need to recognise that there will be a possible tension between policies that seeks a maximise housing density and policies seeking

to meet the full range of housing needed necessitating a range of new housing types, scale and design.

HBF would request that the Council also considers the need and demand for housing on brownfield sites and any potential market saturation, recognising these sites may be more suited to high density mid-high development which results in a certain kind of housing type, often apartments which appeal to a particular kind of buyer. It will be important in providing the mix and range of housing types that a mix and range of housing sites are allocated included greenfield sites which may be better suited to the delivery of family housing.

15. Should sites for traveller communities be provided as part of large developments for housing and/or employment?

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16. Are there any other ways that sites for traveller communities could be met in our area?

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17. What site characteristics and locations would be most suitable for different traveller communities?

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18. What economic and regeneration needs should the Strategic and Local Plan address in supporting businesses to invest, expand and adapt?

HBF would suggest that the Council needs to consider the interaction between employment and housing. An increase in the number of jobs can it itself generate a requirement for additional housing. It may be that a higher housing figure is needed for economic reasons and a higher housing number is also needed for housing delivery reasons.

19. How should the Strategic and Local Plan best seek to accommodate employment needs and provide an environment that is attractive to inward investment?

Again, HBF note the interaction between employment and housing. In the same way that an increase in the number of jobs can it itself generate a requirement for additional housing, the failure to address housing needs in the midst of a housing crisis will have negative social, economic and environmental consequences for the region. It may be that a higher housing figure is needed for economic reasons and a higher housing number is also needed for housing delivery reasons.

20. How should the Strategic and Local Plan support and encourage rural employment?

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21. How could the Strategic and Local Plan best enable change and encourage investment to support our city and town centres to adapt, evolve and thrive?

HBF recognise that housing can play an important role in town centre regeneration, and the redevelopment of brownfield sites for housing and other uses is supported by national planning policy and guidance. However, the deliverability of residential development on brownfield sites will be dependent upon the viability of those sites and the demand for high density city centre

living post Covid-19. It is important that delivery of the housing requirement set out in the SLP does not rely overly ambitious intensification of dwellings on allocation and/or windfall sites. HBF would request that the Council note the possible issues around the need and demand for housing on brownfield sites and any potential market saturation, recognising these sites may be more suited to high density mid-high development which results in a certain kind of housing type, often apartments which appeal to a particular kind of buyer. It will be important in providing the mix and range of housing types that a mix and range of housing sites are allocated included greenfield sites, including possibly green belt sites, which may be better suited to the delivery of family housing.

22. How can the Strategic and Local Plan protect and encourage essential shops, services and facilities in villages and rural areas?

HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice and a buffer to ensure that housing needs are met in full.

Some development may therefore also be needed in villages, and in relation to rural development, HBF would suggest that the spatial strategy should recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.

Similarly, the SLP should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. Any list of village services should not be used as a basis for only locating development close to existing services rather identifying where services could be improved through new development. There is a real danger that any such criteria could being used negatively to become a way of preventing development in certain communities rather than promoting improved villages and neighbourhoods.

The SLP should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services. It could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.

23. What types of infrastructure do you consider are most critical to be delivered alongside new development?

Development can only be required to mitigate its own impacts and cannot be required to address existing issues and shortfalls in provision. It would be unreasonable and fail the CIL tests for developers to be expected to pay to address existing deficiencies. It is not appropriate for any methodology of site selection to increase the likelihood of a site being allocated on the basis of how it could address existing infrastructure problems, or over deliver against policy requirements.

24. Given their size, if strategic scale new settlements were to form a part of the Strategic and Local Plan, what accompanying infrastructure would be necessary?

HBF does not comment on individual allocation. We would however note that new settlements and large urban extensions can have long lead times. Reliance on one (or more) new settlement(s) and/or urban extension(s) for housing delivery may mean delivery from these sources will occur later on in the Plan period. This increases the importance of the need for a range of other sites to be provided to ensure a Five-Year Land Supply and early delivery of much needed housing. It will be important for policies and allocation in the Plan to provide for a range of housing sites, and as such the site selection methodology needs to reflect this.

25. What key services and facilities do you consider most important in deciding if a rural settlement is a suitable location for new homes and other forms of development?

HBF note that new development settlements in settlements that currently do not have particular service, or range of services, can create the conditions that would also support the development of new services and facilities in those location, helping them to become more sustainable.

The Spatial Strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village. The site selection methodology needs to recognise this reality.

Similarly, the Local Plan will also need to recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. Any list of village services should not be used as a basis for only locating development close to existing services rather identifying where services could be improved through new development. There is a real danger that any such criteria could being used negatively to become a way of preventing development in certain communities rather than promoting improved villages and neighbourhoods. The site selection methodology should reflect this position.

26. Should the Strategic and Local Plan safeguard sites or routes for longer term infrastructure projects?

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Planning for sustainable development

**27. Are there any additional development scenarios that should be considered?
(a) If yes, please describe what they are.**

The consultation considers six distinct scenarios/spatial options to consider the understand their 'pros' and 'cons of each of them. As para 6.8 of the consultation notes, none of these scenarios would, on their own, deliver sustainable development and the final strategy will be a combination of different elements.

The six different development scenarios tested were:

1. Urban concentration
2. Urban extensions
3. Urban extensions, avoiding the Green Belt
4. New strategic settlements
5. Rural dispersal
6. Sustainable transport

HBF do not have any alternative suggestion for spatial options that could be tested but as the strategy will be a combination of approaches it is important that the different combination of approaches are tested as the plan's spatial strategy is further developed.

28. Are the pros and cons identified for the six development scenarios a fair and accurate assessment?

(a) If not, which one(s) and what are your reasons?

HBF would suggest that each scenario should also be tested to see the implication it would have on the availability of small sites. There will also be a need to consider the deliverability and viability of housing under each option, including mix, type and affordable housing percentages.

29. Which of the development scenarios, or combination of them, do you consider the most appropriate for the Strategic and Local Plan?

HBF believe the housing requirement in the SLP should be increased from the standard method baseline for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support employment growth. HBF would request that the Council considers the proposed housing requirement fully considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing, each of which on their own may be a reason to increase the housing numbers, so their cumulative impact could be significant. A higher housing requirement may also be particularly important if development is to be of the scale necessary to support significant infrastructure projects in a way that is viable and deliverable.

As such HBF suggest that this means that it is likely elements of all of the scenarios may be needed. Indeed, the Council acknowledges a combination of approaches will be needed. HBF suggests development within existing settlements, urban extensions and new settlements may all be needed to meet the housing requirements in full. Development in both non-greenbelt location and green belt locations will be needed, development in villages and along transport corridors will also be needed. This would enable the Plan to provide for a full range and type of sites to enable a full range and different housing types to be provided to meet needs in full.

HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice and a buffer to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.

30. Are there any places not currently identified in the rural settlement hierarchy, which could/should be included?

HBF considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. HBF requests that the Plan's approach to the distribution of housing should ensure the availability of a sufficient supply of deliverable and developable land to deliver the housing requirement.

HBF are of the view that in light of the housing crisis, and the scale of housing need for Cheltenham, Gloucester and Tewkesbury a variety of site allocation will be needed, and this is likely to include the need for greenfield also green belt releases.

HBF would expect the Plan to be an ambitious plan that plans for the future development of Cheltenham, Gloucester and Tewkesbury, detailing where new housing will go, meeting housing needs in full, providing certainty for the house building industry and setting out a long-term vision for the area, in accordance with the NPPF.

HBF suggests the Council must come to a view on the appropriate strategy need for a new settlement within the area. HBF reiterate the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice and a buffer to ensure that housing needs are met in full.

As the spatial strategy for the Plan is considered, HBF reiterates that there will be a need for the settlement hierarchy to be established and used to inform allocations. We would also reiterate that in order to support rural development and smaller home builders some development may need needed in villages. As such there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together.

31. Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

HBF would highlight the importance of consideration being to the Monitoring of the Plan, right from the outset. Monitoring is an essential part of the Plan, Monitor, Manage approach, and it is essential that actions are taken if monitoring shows under-delivery of housing during the Plan Period. It will be important for the Plan to include a monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should include the actions to be taken if the targets are not met.

HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under-delivery much more quickly than would be possible through the production of another plan, or plan review.

HBF trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry. HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the accompanying contact details for future correspondence.