



Local Plan Consultation  
Forward Planning Team  
Cotswold District Council  
Council Offices  
Trinity Road  
Cirencester  
GL7 1PX

SENT BY E-MAIL AND POST

27<sup>th</sup> February 2015

Dear Sir / Madam

## **LOCAL PLAN REG 18 CONSULTATION – DEVELOPMENT STRATEGY AND SITE ALLOCATIONS**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments and in due course attend the Examination Hearings Sessions for the Local Plan.

### **Housing Need and Supply**

Under **Policy SP3 – Land for New Housing** the Council proposes to meet objectively assessed housing needs by making sufficient land available for 7,600 dwellings over the plan period. It is recommended that the following wording is included in **Policy SP3** :-

- "full" (inserted before) OAHN ;
- "at least" (inserted before) any specified number of dwellings ;
- "2011 – 31" (inserted after) the plan period.

**Policy SP3** continues by setting out a settlement hierarchy comprising of Cirencester, 16 named towns and villages and then other locations. The exact allocation of housing development is set out in **Policy SP5 – Distribution of Housing & Employment**. For the purposes of accuracy the Local Plan text should be checked for inconsistencies in cross references which refer to site allocations in 17 and 18 towns and villages (excluding Cirencester and other locations) but only 16 settlements are named in **Policy SP5**.

At this time there are considerable differences of opinion on the appropriateness of assumptions used in the OAHN of Stroud, Forest of Dean & Cotswold Report

prepared by Neil McDonald with Christine Whitehead dated October 2014 (Revised). Therefore it is not agreed that a proposed housing requirement of 7,600 dwellings is meeting in full the OAHN for Cotswold District Council. These disagreements include:-

- household formation rates – the use of a partial rather than full return to trend, the use of a mid-point and the application of any adjustments to 25 – 34 age group only rather than all age groups ;
- economic forecasts - an assessment of jobs growth from 2014 – 31 ignoring 2011 – 2014, only an arbitrary 50% adjustment for jobs led growth identified in the Cambridge Economics forecast and a “policy on” re-distribution of economic growth based on the LEP SEP ;
- market signals and affordability - a dismissive approach to evidence on worsening trends.

It is suggested that the Council reads the further written Hearing Statements on the above mentioned Report submitted by participants to the resumed Stroud Local Plan Examination as well as the Stroud Inspector’s Initial Views on the work undertaken by the Council during the suspension of the Examination dated 12<sup>th</sup> February 2015 in which the Inspector has raised several concerns and requested that further work is undertaken.

Moreover there is a concern that there is not an agreed position amongst the Gloucestershire Housing Market Area (HMA) authorities namely Cheltenham, Gloucester, Tewkesbury, Stroud, Forest of Dean and Cotswold Councils on the OAHN and its distribution across the HMA which has ramifications for compliance with the Duty to Co-operate. It is noted that to overcome these identified concerns the Stroud Local Plan Proposed Changes consultation (ending on 25<sup>th</sup> March 2015) introduces an early review policy. Such a proposal should also be considered by Cotswold District Council.

### Other Policies

Any contributions to bus routes, cycle ways and improving community facilities, open space and allotments, etc sought under the **Settlement Strategy Policies** must comply with Paragraph 204 of the NPPF and the Community Infrastructure Levy (CIL) Regulations (2010) as amended and further guidance is set out in the NPPG.

Under **Policy SP9 – Local Green Spaces** the Council should ensure that any allocations comply with the NPPF definition of a Local Green Space as set out in Paragraph 77 of the NPPF especially given that “*designation will not be appropriate for most green areas or open space*”.

### Conclusion

It is hoped that these comments are of assistance to the Council in preparing the next stages of the Local Plan. In the meantime if the Council requires any further information or assistance please contact the undersigned.

Yours faithfully  
for and on behalf of HBF



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