



Stroud District Council
Ebley Mill
Ebley Wharf
Stroud
Gloucestershire
GL5 4UB

SENT BY E-MAIL AND POST

25 March 2015

Dear Sir / Madam

STROUD LOCAL PLAN PROPOSED CHANGES CONSULTATION

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

It is noted that objectively assessed housing needs (OAHN) are specifically excluded from this Proposed Changes consultation as recommended by the Local Plan Examination Inspector. However the OAHN remains a matter of serious concern for the HBF and other parties regarding the soundness of the Stroud Local Plan. In the meantime the HBF would like to submit the following representations on the current Proposed Changes consultation and appear at any future Examination Hearing Sessions to discuss these matters in greater detail.

In **PSC 008** the word "Gloucestershire" should be inserted before the words housing market area. Likewise in **PSC 010** to **Policy CP2** the word "this" in reference to the housing market area should be replaced by the word "Gloucestershire". It is also suggested that the dates set out in **PSC 008** which form part of the supporting text only should be incorporated into **Policy CP2**.

The Council should re-check that the modifications set out in **PSC 087** to **Policy ES1 – Sustainable Construction & Design** are compatible with the outcomes of the Government's Housing Standards Review (when known) and other recent consultations such as "*Next Steps to Zero Carbon Homes – Allowable Solutions*" and "*Next Steps to Zero Carbon Homes – Small Sites Exemptions*". Similarly **PSC 088** to **Policy ES1** makes reference to the

Council producing a Supplementary Planning Document (SPD). The Council should be mindful that the National Planning Policy Framework (NPPF) in Paragraph 154 is explicit that SPDs should not add to the financial burden of development and the Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden in an SPD.

As previously stated the OAHN and the housing requirement are yet to be determined therefore the amended Table proposed in **PSC 100** may be subject to further modification pending the outcome of the resumed Stage 1 Examination Hearing Sessions concerning the overall housing and employment requirements which are to be held on 12 – 15th May 2015.

In conclusion it is hoped these representations are useful to the Council in informing the next stages of the Stroud Local Plan. If any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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