

Black Box Planning on behalf of Taylor Wimpey

Hearing Statement

Matter 3: Housing Need and Requirement

1. This Hearing Statement has been prepared on behalf of Taylor Wimpey and should be read alongside the Representations submitted in response to the pre-submission (Reg19) version of the Stroud Local Plan (SLP) in May 2021. It seeks to respond to specific questions set out in the Inspector's Matters, Issues and Questions raised in respect of Matter 3, where relevant to concerns held by Taylor Wimpey.
2. These representations are submitted with regard to TW's control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north and Newland Homes controlling a small proportion of the site fronting Grange Road. All parties have been working jointly in respect of the emerging strategic allocation at Whaddon to ensure a comprehensive approach is taken to the masterplanning and deliverability of the site and associated infrastructure.

Gloucester's Unmet Housing Need

4. Based on the submitted evidence are we correct in our understanding that Gloucester City's housing needs, housing land supply and level of any unmet housing needs have yet to be confirmed and examined? How far have these assessments progressed?

3. The unmet housing need arising for Gloucester is already established in respect of the unmet need against the adopted JCS. The JCS was adopted in 2017 on the premise that it would be subject to an immediate review given that it was recognised it did not meet the full needs of the City for the plan period. This is plainly set out in JCS paragraph 7.1.14 where it states;
"As presented in the housing trajectories below, Gloucester City has an identified shortfall against the total JCS housing requirement of 1,072 dwellings."
4. JCS Policy REV1 provided the intended mechanism for immediate review, yet the JCS review is still to reach any meaningful stage. However, the Duty to Cooperate Statement (EB3) at paragraph 5.17 confirms that the City Council has indicated (February 2021) that the level of unmet housing needs for the City for the new plan period could be between 5,631 and 6.131.

5. On this basis it is explicit that the unmet housing needs of Gloucester require the Whaddon allocation to be confirmed now. Further delay to addressing the unmet housing need only serve to prolong a most unsatisfactory situation where a plan led system is clearly failing. The PPG is clear that;

“Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates or are not relying on the inspector to direct them.” Paragraph: 022 Reference ID: 61-022-20190315

6. We therefore reiterate our position that the JCS authorities have had sufficient time and evidence to confirm their collective position for Whaddon to be allocated or otherwise, and in the unlikely event that Whaddon is not required for the City’s unmet need, the site reverts to being a preferable option for meeting Stroud’s needs given its obvious sustainability credentials.

6. The Plan states that the 2017 adopted JCS recognises that ‘Gloucester City has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9’. National policy states that local plan policies are required to be reviewed within five years of adoption of a plan. In this context, and if the level of any unmet housing need is uncertain at this stage, why does the Council consider it necessary to allocate/safeguard land that may or may not be required?

7. The first part of this question presents an out of date position. The City Council’s Five Year Housing Land Supply Statement (May 2021) clearly demonstrates that the JCS presented an overly optimistic trajectory. Indeed, this is a general and unfortunate symptom of the JCS as various housing land supply appeal decisions testify. From the moment of the JCS adoption, there was sufficient certainty regarding unmet need for Gloucester to suggest the allocation of Whaddon would be necessary going forward. The JCS Inspector had foresight in this regard where at paragraph 79 of her Interim Report (May 2016) she stated;

“On the evidence before me there appear to be no other appropriate sites to form additional, sustainable, urban extensions to Gloucester, which fall entirely within the JCS area and have not otherwise been counted within Gloucester’s district capacity. Nonetheless, there seem to be two reasonable omission sites on the southern edge of the Gloucester urban area in Brookthorpe/Whaddon (OM3) and Hardwicke (OM4), the former of which straddles the border with Stroud and the latter of which lies wholly within Stroud.”

8. Nothing has changed to deviate from that train of thought, apart from the lack of progress with the JCS review. Ideally the plan reviews' timetables would have aligned but the JCS has experienced delays to keep pace with the SLP review.
9. As such, it would be misrepresentative of evidence to suggest that the SLP should assume there is no short-medium shortfall for the City, and that the matter can be adequately deferred to a further LP review.
10. As highlighted above, the PPG alongside the NPPF requirement for plans to be 'effective' both clearly emphasise that cross-boundary strategic matters should be dealt with and not deferred.
11. In considering this issue, it is also prudent to be mindful of NPPF paragraph 22 where the JCS authorities and Stroud District should consider the likelihood of further need arising of Gloucester projecting at least for the next 30 years. In this context, there can be no dispute that Gloucester is a constrained authority and will require assistance from neighbouring authorities, and options for growth to the north, west and east of the City are heavily constrained by both environmental and policy constraints. Essentially, there is no question that the allocation of Whaddon is required.
12. In respect of question 7, we would concur with the view that applying a 'safeguarded' status to Whaddon would imply that the site is considered suitable for development, albeit we recognise such a status is normally associated with green belt release.

8. When will it be determined whether the site at Whaddon would be required and when it would be consistent with the 'approved strategy' of the JCS Review? Would this be at the point of adoption of the JCS Review? Does the Plan clearly set this out and does this justify the need to allocate/safeguard this site now?

13. As set out above, it is not appropriate for the SLP to defer the allocation of Whaddon. The JCS authorities should either confirm the request to allocate Whaddon for Gloucester's housing needs or otherwise during the SLP examination. In any event, the only correct decision is for the site to be allocated in order to deliver sustainably located housing growth and infrastructure for the needs of the local housing market area. To arrive at any other conclusion would be contrary to policy and highly illogical, in the context of Whaddon's incomparable sustainability in locational terms compared to Sharpness for example.

9. Overall, is the inclusion of land at Whaddon to meet the needs of Gloucester justified, effective and consistent with national policy?

14. Yes, the Whaddon site should be allocated. It is inherently sustainable and is free of any insurmountable development constraints. TW intend to submit an outline planning application during Spring 2023 having undertaken engagement with key stakeholders to ensure a deliverable scheme is forthcoming following a comprehensive masterplanning approach.
15. As set out in our earlier representations, we propose revised wording to the G2 allocation policy to address our concerns with the indecisiveness over its 'safeguarded' status in the draft SLP. We support the notional gesture towards Gloucester City's unmet needs, but fundamentally object to it being a safeguarded site in the SLP plan when all available evidence points to the site suitability for allocation and the need for it to be allocated now.
16. As made clear from our submissions, the SLP would fail the tests of soundness should the status of Whaddon remain safeguarded rather than allocated.

15. The housing requirement of 'at least 12,600' dwelling housing requirement does not include the 3,000 dwelling contribution that the Plan is proposing to help meet Gloucester's unmet housing needs. Notwithstanding our previous questions on the soundness of meeting unmet needs, why does this contribution not form part of the housing requirement figure? Is this approach consistent with national policy and guidance?

17. NPPF paragraph 61 is clear that any needs that cannot be met within the neighbouring areas should also be taken into account in establishing the housing requirement to be planned for. It unambiguously follows therefore, for the SLP to be sound, the 3,000 dwellings attributed to Whaddon should form part of the housing requirement figure.