

Part B – Please use a separate sheet for each representation

Name or Organisation:

Robert Hitchins Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="√"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="√"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="√"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Section 2.5 Housing

Stroud’s district’s housing requirement up to 2040

The Government continues to prioritise the need to significantly boost the supply of homes in the country to meet housing needs and to address long term affordability issues.

The standard method identifies a minimum annual housing need figure, it does not produce a housing requirement. (PPG paragraph 002 reference ID 2a-002-20190220). Neither should this figure be referred to as a target.

Para 2.5.2 of the Plan states that the Council has worked with the other adjoining authorities in Gloucestershire to prepared the Local Housing Need Assessment (ORS September 2020) and that this confirms the Government Standard Method figure of 630 new homes per annum. This is a 40% increase from the figure in the adopted Local Plan of 456 dwellings per annum.

Table 2 housing requirement to 2040, identifies a housing requirement of at least 12,600 dwellings (para 2.5.4), this is supported. Paragraph 2.3.23 acknowledges that delivering the growth expected by central Government within the next 20 year time horizon will be challenging for the district. The strategy proposes a sustained increase in house building rates. (During 2019/2020 662 homes were built across the district). However, to sustain the rate proposed in the Plan, it is critical that deliverable sites need to come forward in a timely manner (i.e. without any delays).

The strategy includes supply from a range of small, medium, large and very large sites at a number of different locations, which together are intended to provide opportunities for all levels of the market to deliver. However, there is a real concern that as the delivery rates are vulnerable to changes in economic cycles, some of the sites may not deliver the number of dwellings envisaged, particularly at the new settlements. Indeed the Plan acknowledges that the creation of new settlements is an ambitious undertaking. Table 6 (page 306 of the Plan) envisages delivery of the new settlement at Wisloe commencing in the period 2020-2025 (50 dwellings) and then 565 dwellings in the period 2025-2030, but there is currently no evidence of any developer promoting the site, the site is promoted by Gloucestershire County Council and Ernest Cook Trust as landowners. As Start to Finish update (February 2020) has demonstrated for sites of 1,500 dwellings, it is some years before they can be relied upon to contribute to meeting housing needs.

“If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in c.3 years. However, from the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.”

The latter applies to the new settlement proposed at Sharpness as well as Wisloe. The new settlements are proposed to delivery 3,900 dwellings in the plan period. The reality for large site delivery is often that they take many years to come forward and they have highly variable build out rates (as shown in Start to Finish). In effect of the total allocated sites in the Plan (Table 2), 9,065, the contribution from Sharpness and Wisloe is approximately 43%.

Table 2 sets out the housing requirement to 2040, the residual requirement is 8,005 dwellings, this is proposed to be met by allocated sites in the Local Plan (9,065) plus an allowance for small sites (75 dwellings per annum over 17 years) giving a total housing supply of 10,340 dwellings which together with commitments (4,595 dwellings) exceeds the housing need by 2,335 dwellings. However, the requirement is not a cap, it is a figure of at least 12,600 dwellings and whilst there is a buffer of about 2,335 dwellings, this could easily be absorbed if the new settlements do not deliver as envisaged. Indeed as set out in representations the assumptions about delivery for the new settlements are not justified There is no clear delivery plan for either of the new settlements proposed, if the plan’s ambitions turn out to be unrealistic, then even with a buffer or approximately 2,335 dwellings this could be considerably eroded.

Consequently by including two new settlements in the Plan without the detailed justification in terms of delivery and viability the strategy is considered to be unsound.

Furthermore in relation to Table 2 the trajectory and commitments in Table 2 are taken from 2020 (rather than 2019 as referenced in the LP) and this should be corrected accordingly.

An objection is made to Table 3 in respect of the housing distribution to 2040 as an objection is made to the inclusion of PS36 new settlement at Sharpness and the inclusion of PS37 new settlement at Wisloe.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Plan sound land at Sharpness, which is considered to be the least sustainable of the two new settlements should be deleted and land at Grove End Farm, Whitminster, which was considered in the Additional Housing Options consultation (including the SA to support the consultation) in October 2020 should be included and allocated in the Plan.

Land at Grove End Farm, Whitminster can provide a sustainable, comprehensive mixed use development which links with and complements the existing settlement pattern and provides for housing and employment, social and recreational needs with access to extensive green infrastructure.

The location of this land at the confluence of the A38/M5 and A419 corridors, and relative proximity to Stroud/Stonehouse, Cam/Dursley and Gloucester presents an opportunity to achieve a mixed use development in a sustainable and highly accessible location (including by public transport). As a location land at Grove End Farm, Whitminster is far more likely to deliver the housing in the plan period, given it is a tried and tested market area and a popular employment location as referred to in the Council's Employment Land Review.

The draft indicative masterplan shows a mixed housing and employment development together with social and community infrastructure. The ridge and eastern parkland area and existing woodland has informed the disposition of green infrastructure which also serves to minimise landscape impacts and buffer the employment land.

The proposed local centre is positioned so as to be accessible to existing residents of Whitminster as well as to new residents.

Employment generating uses are incorporated both within the local centre fronting the A38 and alongside the A419 near J13 of the M5 in attractive locations to the market thereby increasing delivery prospects. (The Council's evidence base - the Employment Land Review acknowledges that this is the most preferred location- the "strongest option" .."this location does have some advantages over the other New Settlement proposals, at least in terms of employment land deliverability. These include the fact that the land is under the control of an experienced developer who is already active in the area, marketing E/B-Class plots at West of Stonehouse, thus knows the local market and business requirements. The employment land is in a very strong location off Junction 13, M5 allowing it to tap into the two core markets of the District – larger sub-regional/regional requirements on the M5 Corridor and large business growth in Stroud/Stonehouse.")

The entirety of the Site is located in Flood Zone 1 (lowest risk of flooding).

A planning application is being prepared, the masterplan illustrates how approximately 2,250 new homes along with employment land, a local centre, sports/recreation facilities and a primary school, landscaping and open space could be accommodated.

The Site is in the control of a highly experienced commercial and residential developer/promoter with a proven track record of delivering strategic mixed-use sites and over the last few years including the West of Stonehouse Strategic Allocation.

It is considered that given the Site's highly accessible location on a transport corridor and also its proximity to Stroud and Stonehouse, that the Site presents an opportunity to achieve a sustainable mixed use development, whilst respecting landscape, heritage and ecological consideration.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our objections go the heart of the Plan and its strategy as we consider the Plan as drafted is unsound.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature

