

**EXAMINATION OF THE STROUD DISTRICT LOCAL
PLAN REVIEW**

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

**MATTER 3:
Housing Need and Requirement**

On Behalf of: Redrow Homes

February 2023



Introduction

CarneySweeney has been instructed by Redrow Homes to submit a Hearing Statement in respect of Matter 3 pursuant to the Issues, Matters and Questions identified by the Local Plan Examination Inspectors in respect of Stroud District Council's Local Plan Review.

This Hearing Statement should be read alongside the representations we have previously made to the Local Plan and in particular, the representations made to the Regulation 19 Consultation (July 2021) and Technical Evidence Consultation (October 2022).



Matter 3 Housing need and requirement

Issue 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan’s housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan’s approach to addressing some unmet housing needs for Gloucester soundly based?

Housing need

The housing need for the District has been established through the Gloucestershire Local Housing Needs Assessment 2020 (LHNA) (EB10) using the standard methodology, as defined in national planning policy and guidance. This sets a baseline of 496 dwellings per annum (dpa) which, when adjusted to take account of affordability, results in an uncapped minimum local housing need of 652 dpa (13,040 dwellings over the plan period).

As identified in the LHNA, once the standard method cap is applied, the minimum number generated reduces to 638 dpa (at least 12,800 dwellings over the 20 year plan period).

The Plan states that the capped standard method figure is a minimum of 630 dpa (at least 12,600 dwellings over the plan period).

- 1. The capped standard method minimum figure in the Plan at 630 dpa is lower than the 638 dpa figure set out in the LHNA. Can the Council point us to the document that sets out the reasoning for this please?**

No comment at this stage – for the Council to respond.

- 2. The PPG advises that ‘The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.’**

- a. As the LHNA identifies a higher housing need above the capped level, what arrangements do the Council have for ensuring that this is planned for as soon as is reasonable? Is this clearly set out in the Plan?**

No comment at this stage – for the Council to respond.

- b. Whilst our queries on housing provision are set out under a later matter, we note that the evidence suggests that housing supply, as at 2020, equates to 14,935 dwellings. On this basis, has consideration been given to a higher level of housing need being set out in the Plan and could this realistically be delivered during the plan period?**

No comment at this stage – for the Council to respond.



Gloucester's unmet housing need

The Plan, at paragraph 2.5.5, states that it 'addresses unmet needs from neighbouring Gloucester by allocating a site for 3,000 dwellings at Whaddon for delivery by 2040'. Core Policy CP2 identifies the location and proposed number of dwellings and Strategic Site Allocation Policy G2 states that the site is 'safeguarded' and includes specific requirements. The policy is subject to the site being required to meet Gloucester's housing needs and providing the location accords with the 'approved strategy' for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Review (JCS Review), which is currently in preparation.

The draft Strategic Housing Matters Statement of Common Ground (SOCG) on electronic page 71 of document EB3 provides some context to the reasons for the allocation to meet potential unmet needs, which is mainly due to different plan production timescales.

Whilst our more detailed questions on Strategic Site Allocation Policy G2 are set out under later matters, our general queries on meeting Gloucester's unmet housing needs are as follows:

- 3. *What progress has been made to finalise the above SOCG and submit a signed version?***

No comment at this stage – for the Council to respond.

- 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?***

No comment at this stage – for the Council to respond.

- 5. *What stage is the JCS Review currently at and what is the timetable for its production and examination?***

No comment at this stage – for the Council to respond.

- 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?***

No comment at this stage – for the Council to respond.



7. ***Provision for designating safeguarded land is set out in paragraph 143 of the Framework and is in relation to the removal of land from the Green Belt. The site proposed to be safeguarded under Strategic Site Allocation Policy G2 is not in the Green Belt. The safeguarding of land would normally imply that, at least in principle, the development of the site was justified. But the caveats in the policy mean that determining whether the site is justified or not, will be determined at a later date. Yet confusingly the site is also identified within a strategic site allocation policy. Can the Council clarify its position on this and explain how its approach in the Plan in this regard, is justified, effective and consistent with national policy?***

No comment at this stage – for the Council to respond.

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?***

No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

Housing requirement

The PPG advises that the standard method identifies a minimum annual housing need figure, but states that it ‘does not produce a housing requirement figure.’ The Plan, through Core Policy CP2, states that ‘Stroud District will accommodate at least 12,600 additional dwellings.....to meet the needs of the District for the period 2020-2040’. This is the same amount as the capped standard method figure for need set out in the Plan.

10. ***Is the identified housing requirement of at least 12,600 additional dwellings justified and consistent with national policy? Does the Plan clearly set out in policy both the overall housing requirement for the plan period as a whole, and the requirement that applies in each year of the plan period?***

No comment at this stage – for the Council to respond.

11. ***In a similar vein to question 2 above, has consideration been given to a higher housing requirement to assist in meeting identified housing needs above the cap? Is this a realistic approach?***

No comment at this stage – for the Council to respond.



12. ***The LHNA considers that the jobs growth forecast aligns with the resident worker forecasts, so there is no need to increase the housing requirement above the minimum figure identified by the standard methodology. Is this approach justified?***

No comment at this stage – for the Council to respond.

13. ***The Plan states that there is an unadjusted need for affordable housing of 424 dpa. This appears to have been established through the LHNA, which identifies a total affordable housing need of 8,476 dwellings in the District for the period 2021-2041. Is our understanding correct?***

No comment at this stage – for the Council to respond.

14. ***The evidence, including the Council’s Topic Paper EB8, further explains that as the identified housing need figure incorporates a significant uplift, and there is additional supply proposed within the Plan, to provide flexibility, this ‘is sufficient to deliver affordable housing without increasing the housing requirement’. Whilst our detailed questions on the affordable housing policy are set out under a later matter, is this approach justified and will the housing requirement in the Plan deliver the identified affordable housing need? If not, what is the Council proposing to do about this, particularly as paragraph 4.21 of the Plan states that affordability is expected to worsen over the plan period?***

No comment at this stage – for the Council to respond.

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?***

No comment at this stage – for the Council to respond.

16. ***To provide clarity for future decision-makers the Plan should clearly identify and distinguish between the objectively assessed housing need, the standard method figure, the housing requirement and the level of provision in the housing requirement to help meet the unmet needs of Gloucester City. Does the Plan do this?***

No comment at this stage – for the Council to respond.

17. ***Paragraph 65 of the Framework states that ‘strategic policies should also set out a housing requirement for designated neighbourhood areas....’. The Council’s evidence details that there are 17 neighbourhood areas within the District with 10 made Neighbourhood Plans (NP). The Council’s Topic Paper on Neighbourhood Planning (EB5) explains that as no made or emerging***



NP allocate housing sites, housing requirements are to be set through site allocations in the Plan currently under our examination.

a. Is this approach consistent with national policy, particularly with regard to paragraphs 65-67 of the Framework?

No comment at this stage – for the Council to respond.

b. Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?

No comment at this stage – for the Council to respond.

c. What are the implications of these proposed housing allocations on the designated neighbourhood areas and any emerging or made NP?

For the Council to confirm, but in terms of Strategic Site Allocation Policy G1: Land South of Hardwicke, it is recognised that the Hardwicke Neighbourhood Plan, which came into legal force in October 2017, was made within the context of the extant Stroud Local Plan and a number of elements of the Neighbourhood Plan, including the settlement boundary, will be superseded on the adoption of the Stroud Local Plan Review. Notwithstanding this, the development proposals for Land South of Hardwicke have been designed in conformity with the design policies of the Hardwicke Neighbourhood Plan.

In addition to the above, the illustrative masterplan for Land South of Hardwicke also seeks to ensure that the areas of Local Green Space designated by the Hardwicke Neighbourhood Plan are either retained, enhanced or re-provided within the site.

