

## 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 7 Delivery and Monitoring

According to the PPG Plan Making, the Plan is an opportunity for the strategic policy-making authority to set out a positive vision for the area the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought forward.

***“At an early stage in the plan-making process strategic policy-making authorities will need to work alongside infrastructure providers, service delivery organisations, other strategic bodies such as Local Enterprise Partnerships, developers, landowners and site promoters. A collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them. In doing so they will need to:***

- ***assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Where deficiencies are identified, policies should set out how those deficiencies will be addressed; and***
- ***take account of the need for strategic infrastructure, including nationally significant infrastructure, within their areas.***

***The government recommends that when preparing a plan strategic policy-making authorities use available evidence of infrastructure requirements to prepare an Infrastructure Funding Statement. This should set out the anticipated funding from developer contributions, and the choices local authorities have made about how these contributions will be used. At examination this can be used to demonstrate the delivery of infrastructure throughout the plan-period.***

***Authorities will also need to ensure that policies setting out contributions expected from development do not undermine delivery of the plan. Plan viability assessment should be carried out in accordance with guidance.***

***Where plans are looking to plan for longer term growth through new settlements, or significant extensions to existing villages and towns, it is recognised that there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. In these circumstances strategic policy-making authorities will be expected to demonstrate that there is a reasonable prospect that the proposals can be developed within the timescales envisaged.”*** (my emphasis)

Paragraph: 059 Reference ID: 61-059-20190315

Whilst the IDP has been prepared, there is no detail setting out the anticipated funding from developer contributions etc. **Furthermore no housing trajectory has been prepared to support the Reg 19 Plan.**

Table 6 only sets out the strategic housing allocations proposed in the Plan in five year periods, a total figure for commitments and a total figure for the smaller proposed local development sites in the Plan. **There is no detailed break down year by year of anticipated delivery.**

Paragraph 73 of the NPPF states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. The specific sites that make up the trajectory are not identified as required by paragraph 67 of the NPPF. The five-year tranches identified in the trajectory do not provide sufficient detail to enable fair and open consideration.

The PPG Housing Supply and Delivery states that ***“In plan-making, strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan.”***

Paragraph: 004 Reference ID: 68-004-20190722 The evidence needs to be tested at examination to ensure that there is a 5 year housing land supply when the Plan is adopted.

Consequently, in order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions.

The PPG provides advice as to how a 5 year housing land supply can be confirmed as part of the examination of policies.

***“When confirming their supply through this process, local planning authorities will need to:***

- ***be clear that they are seeking to confirm the existence of a 5 year supply as part of the plan-making process, and engage with developers and others with an interest in housing delivery (as set out in Paragraph 74a of the Framework), at draft plan publication (Regulation 19) stage.***
- ***apply a minimum 10% buffer to their housing requirement to account for potential fluctuations in the market over the year and ensure their 5 year land supply is sufficiently flexible and robust. Where the Housing Delivery Test indicates that delivery has fallen below 85% of the requirement, a 20% buffer should be added instead.”***

Paragraph: 010 Reference ID: 68-010-20190722

The draft Local Plan Viability Assessment (page 135) (May 2021) includes a delivery by year for each of the strategic sites. This table includes land at Grove End Farm, Whitminster (although it is not a proposed allocation in the Plan), it should be noted that Grove End Farm can deliver dwellings in advance of the new community at Sharpness (PS36 is not expected to delivery until 2027 whereas Grove End Farm, Whitminster can deliver in 2025 and also delivers more dwellings than Wisloe which is expected to start delivering that year).

### **Comments on Table 6**

It would be helpful if the policy reference numbers were included.

1. Commitments should be update to 2020 (instead of 2019)
2. The housing figures for PS24 Cam North West and PS25 Cam North East extension are incorrect (they are transposed. They should be 900 dwellings and 180 dwellings respectively)
3. The housing figures for the Hunts Grove Extension PS30 should be 750 dwellings (not 300 dwellings)
4. The housing figures for G1 South of Hardwicke are also incorrect, they should be 1,350 dwellings
5. PS34 Sharpness Docks should be 300 dwellings
6. PS36 Sharpness new community should be 2,400 dwellings
7. P219s Stonehouse North West should be 700 dwellings
8. No justification is provided for the assumptions on small windfalls

The graph on page 306 showing the total housing land supply is not supported by any uptodate evidence.

### **Delivery assumptions**

The NLP/Lichfield research has recently been update (February 2020) and concluded that the average time from validation of an outline to the delivery of the first dwellings for large sites is from 5yrs to 8.4 years depending on the size of the site. For a site in excess of 2000 dwellings the average time frame from validation of the first application to completion of the first

dwelling was 8.4 years. For a site of up to 1,500 dwellings the average time frame from validation of the first application to completion of the first dwelling is 6.9 years.

The housing trajectory in Table 6 of the Plan is intended to set out the anticipated delivery for the proposed strategic sites. We have already set out our objections to PS36, the proposed new settlement at Sharpness and also PS37 the proposed new settlement at Wisloe. Given the Lichfield research referred to above, neither sites would achieve the delivery rates anticipated in Table 6, even if applications for both sites are submitted in 2021, Sharpness would not see any completions on site until late 2029 and Wisloe not until mid to late 2027. Whereas land at Grove End Farm, Whitminster as indicated in our Position Statement could deliver the first houses in December 2024, the site is within the control of a highly experienced employment and residential developer/promoter with a proven track record of delivering strategic sites in Stroud (e.g. land at Great Oldbury (west of Stonehouse) which was allocated in the adopted Local Plan and indeed in Gloucestershire.

Consequently, even if the Council's rates are applied (as included in Table 7.4 of the Draft Viability assessment (May 2021) the new community at Sharpness would not deliver in its entirety (i.e. 2,400 dwellings in the plan period). Only about 2,100 dwellings would be delivered and there would be a shortfall of approximately 460 dwellings, this is on the basis of the Council's anticipated trajectory. As set out in representations to PS36 we object to the trajectory in the Viability Assessment, which indicates a build out rate every year from the second year at 150 dwellings per annum, then for the remaining four years of the plan period increasing by 66% a year to 250 dwellings per annum. The Lichfield research concluded that for schemes of 2,000 dwellings or more the average annual completion rate across the delivery period was 160 dwellings per annum. The research also concluded that large sites which build out over five years or more are inherently likely to coincide with a period of economic slowdown at some point during their build out. It therefore makes sense for housing trajectories for such sites to include an allowance for the build out rate to slow down at some point.

The research concluded on lead in times that :

***“On average, larger sites take longer to complete the planning application and lead-in processes than do smaller sites. This is because they inevitably give rise to complex planning issues related to both the principle of development and the detail of implementation.”***

Furthermore, ***“plan making and the work involved in maintaining a five year housing land supply must be driven by realistic and flexible housing trajectories, based on evidence and the specific characteristics of individual sites and local markets.”***

***“For local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period. Equally, recognising the ambition and benefits of more rapid build out on large sites, it may mean a greater focus on how such sites are developed.”***

As currently presented the Plan does not provide any evidence for the justification of the delivery of the sites proposed in the Plan.

It has been established in numerous Local Plan examinations that the supply should exceed the housing need to provide sufficient contingency to ensure that the need will be met. In the

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy examination, the Inspector required that the housing requirement was set 5% above the housing need. More recently the NPPF paragraph 73 refers to the need for a buffer:

***“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:***

- a) 5% to ensure choice and competition in the market for land; or***
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or***
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”***

Paragraph 74 states:

***“A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:***

- a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and***
- b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.”***

Whilst the Plan provides for in excess of the housing requirement (9,065 dwellings on allocated sites in the Local Plan plus small sites allowance of 1,275 dwellings, plus commitments of 4,595 dwellings giving a total of 14,935 dwellings); it should be noted that of the allocated sites, 3,900 dwellings are at the new settlements at Sharpness and Wisloe. Given, that a proportion of the sites will inevitably be delayed as referred to above and in particular as set out in our representations to PS36 Sharpness and PS37 Wisloe, what appears to be a healthy supply over and above the requirement (which is after all a figure which is at least 12,600 dwellings), could be significantly eroded by delays in housing delivery, therefore putting the strategy at risk.

A detailed housing trajectory needs to be provided to support the Plan.

(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.

As required by the NPPF the Plan should be supported by a detailed housing trajectory that can be examined to determine housing land supply. The trajectory proposed needs to be justified by supported evidence.

(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:



Date:

20.07.2021