

## Stroud District Local Plan Review Examination

### Response to Matter 3: Housing Need and Requirement

For and on behalf of: Charterhouse Strategic Land

February 2023

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#### Introduction

1. This Hearing Statement is for and on behalf of Charterhouse Strategic Land (CSL) (representor no. 865) with respect to the Stroud District Local Plan Review (SDLPR) submitted for Examination by Stroud District Council (SDC).
2. It is concerned with **Matter 3** (Housing Need and Requirement) as set out in the Inspectors' Matters, Issues and Questions (MIQs) (Examination document reference: **ID-05**).
3. The Hearing Statement has been prepared on the basis:
  - a) that the Inspectors have received and reviewed in detail the representations previously submitted to the Stroud District Local Plan Review Pre-Submission Draft (May 2021) on behalf of CSL.
4. This Statement does not repeat previous representations, which must be read in conjunction, but makes points relevant to the Matter in question in the following sections.

## Response to Issue 3

*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

**Question 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?*

5. This is for SDC to answer. There is however no evidence available to indicate why a minimum figure of 630 dpa is used in the SDLPR rather than the 638 dpa figure from the Gloucestershire Local Housing Needs Assessment.

**Question 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?*
- 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?*
6. These questions are for SDC to answer. With respect to Question 2a. it is important that the SDLPR makes provision in policy and through site allocations for delivering housing that meets needs above the capped level which is an

artificial ceiling. This is in order to ensure that housing is actually provided to meet the needs identified rather than the artificial cap.

7. With respect to Question 2b. a higher level of housing to meet needs could be delivered in the plan period through the inclusion of a wider range of housing sites including those in and adjacent to sustainable settlements such as Painswick (which includes CSL's land interest at Clattergrove, Painswick) in accordance with the Plan's vision and Strategic Objectives and to support long term vitality of such locations. Indeed, it is CSL's conclusion that the current level and pattern of housing site allocations diminishes the role and future sustainability of many existing settlements and that the SDLPR could achieve a more appropriate level and distribution of housing growth with further site allocations.

#### Housing Requirement

**Question 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?*

8. Please see the answer to Question 2 above.

**Question 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?*

9. The Gloucestershire Local Housing Needs Assessment (GLHNA) (**EB10**) does appear to be the basis for the identified need for affordable housing of 424 dpa. The GLHNA models affordable housing needs over the 2021 – 2041 period and identifies a total affordable need in Stroud District of 8,476 dwellings over the period 2021 – 2041.

**Question 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?*

10. The GLHNA identifies an affordable need of 424 dpa (unadjusted). The affordable housing need equates to some 67.3% of the total 630 dpa housing requirement proposed for the District in Policy CP2. There is no published evidence to show how SDC plans to ensure that the 424 dpa affordable housing need is actually delivered especially as the Plan identifies that affordability is likely to worsen during the plan period. This is contrary to the clear expectations of NPPF paragraphs 15 and 61. Policy CP9 (Affordable Housing) takes the figure at face value without further interrogation of the figure or any certainty that the Plan has been prepared to enable meeting affordable housing needs.
11. The Local Housing Market Model (**EB99**) was not published at the time of the preparation of the Pre-Submission SDLPR nor is it cross-referenced in the Plan as forming part of the evidence base. It is considered that EB99 is a post-publication attempt to expand the detail and justify the housing needs for the various Clusters. It is not certain that EB99 is aligned with the GLHNA in terms of market or affordable housing needs. It is not possible to see how EB99 has calculated the potential housing need (including affordable housing need) at the Cluster level and there remains a gap between evidence and rationale of EB99 with the actual planned provision in the SDLPR.
12. Setting aside concerns with EB99, on its own terms, it indicates in the Cotswold Cluster for example a total need of 193 dwellings over the period 2021 – 2041 (an affordable housing need of 61 dwellings and of 132 market dwellings) in the Cotswold Cluster for the period 2021 – 2041.
13. The timing of the modelling of needs set out EB99 is unclear in relation to house prices in the Cotswold Cluster that have increased very significantly since 2020, worsening affordability, which has not then been factored into the future need analysis set out. It is also questionable as to whether the EB99 findings are to be considered as a housing need or a housing requirement (i.e. the dwelling target)?

14. In any event, EB99 indicates a significant level of affordable and indeed market housing need in the Cotswold Cluster area, but the SDLPR then fails to provide sufficient housing land allocations in the area to meet those needs (a single site, PS41, is proposed for up to 20 dwellings, representing at best 10% of the modelled need).
15. Indeed, CSL are concerned that if market and affordable housing need is to be met, there is no clear evidence as to how this has assessed at the local level and how it has been reflected into the total planned housing requirement for the District or the proposed spatial distribution strategy.
16. For affordable housing it is therefore equally uncertain as to how the proposed total and spatial distribution through Policy CP2 or through the proposed site allocations will deliver what is needed. Indeed, some of the proposed sites are where affordable housing contributions may not be required (by virtue of Policy CP9) or where development viability would result in a contribution to affordable housing provision below the levels sought in the policy.

### **Making the Plan Sound**

17. The current level and pattern of housing site allocations undermines the future sustainability of existing settlements and the SDLPR could achieve a more appropriate level and distribution of housing growth with further site allocations delivering a greater number of new dwellings to settlements including Painswick and the Parish Clusters to support long term vitality of such locations.
18. For the Plan to operate effectively and be capable of proper implementation clear geographic and specific definitions of 'local' housing need are required, based on detailed evidence (consistent with the latest Local Housing Needs Assessment for the District) for the settlement, Parish Cluster, the AoNB, or other sub-District level where these plan policies seek to direct and shape residential development.
19. The SDLPR lacks clarity and justification for 'local' housing needs, including for affordable housing as drafted and this is needed to make the Plan sound.