

MATTER 3: HOUSING NEED AND REQUIREMENT

1. This Hearing Statement has been prepared on behalf of Slimbridge Parish Council (SPC), who have submitted extensive representations in relation to the proposed Wisloe new settlement (hereafter referred to as "PS37").

Q.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?**
2. It is indeed correct to point out that paragraph 66 of the Framework specifies that Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.
 3. Paragraph 67 of the Framework goes on to specify that where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.
 4. It is not evident why the District Council has failed to adhere to these particularly important sections of the Framework's content.
 - b. **Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?**

5. No, it is not evident what the proposed housing requirements for each neighbourhood area actually are.

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

6. Slimbridge Parish was designated by Stroud District Council as a Neighbourhood Area for the purposes of creating a Neighbourhood Plan on 3 July 2020 under the Localism Act 2011. The Neighbourhood Plan area follows the Parish Council boundary (see Appendix 1).
7. The Slimbridge Neighbourhood Development Plan (NDP) commenced its Regulation 14 consultation on 23 January 2023, which will conclude on 5 March 2023. Questionnaires have been made available for stakeholders to complete.
8. The Slimbridge NDP includes planning policies to influence planning decisions within the Parish. It also includes practical projects and actions on topics which are not directly related to land-use planning but are priorities for the local community.
9. The Draft NDP acknowledges that the emerging Local Plan includes a draft allocation of a new settlement within the Neighbourhood Area and that draft proposals in the emerging Stroud District Local Plan include approximately 1,500 homes, employment, residential, retail, community and open space uses (including a primary school), as well as strategic green infrastructure and landscaping.
10. It specifies that the potential allocation of a new settlement within the Slimbridge Neighbourhood Area is a Stroud District Local Plan matter and that the NDP has no power to set the strategic allocation approach. Nevertheless, once the NDP policies are formally approved (or 'made'), they will apply to development that is brought forward within any Local Plan strategic allocation sites in Slimbridge Parish during the lifetime of the made NDP. The NDP's approach to and expectations for any strategic development within the Neighbourhood Area is set out in more detail in Section 5B.
11. Draft Policy SD3: 'Sustainable Development to Meet Local Housing Needs' in the Slimbridge Draft NDP stipulates that proposals for housing developments to meet evidenced local housing need, as set out in the Slimbridge Parish Local Housing Needs Report (2022), or any subsequent equivalent study, will be supported in principle provided that development complies with a number of caveats.
12. The accompanying local housing needs report identifies that despite the incomplete evidence collected, it is apparent that a need exists for starter homes for young people and also some residents would like to downsize, preferably to a bungalow. This demonstrates a requirement for an unquantified number of smaller homes in the future.

Efforts are ongoing to better understand the level of need for accommodation in Slimbridge.

13. Consequently, whilst the Slimbridge Draft NDP contains a range of development management policies, it lacks any further detail regarding what the proposed housing requirements in the Neighbourhood Area would be, or where individual local site allocations will be located.
14. We have noted that within the 'Stroud District Five Year Housing Land Supply (December 2022)' document, Appendix 5: Non-allocated Planning Permissions: Small Sites by Parish – 1st April 2022 identifies total commitments from this source of 414 dwellings. These are spread across 53 Parishes across the whole District.
15. However, it is noticeable from the Appendix that Slimbridge is one of a total of eight Parishes where zero commitments have been recorded.
16. It is regrettable that the Draft Local Plan fails to provide a clear steer to Neighbourhood Planning Groups in terms of providing them with indicative housing numbers for each of their individual areas. This appears to be a valuable opportunity to add more weight and substance to each new Neighbourhood Plan that now risks being missed.
17. Furthermore, we consider that a crucial deficiency of the Draft Local Plan is that it fails to recognise and support the contribution that Neighbourhood Plans could make towards meeting the District's housing land supply. Instead, it appears to have pre-determined upon a planning strategy that is heavily reliant on the provision of new settlements, despite there being a distinct lack of any clear evidence available to demonstrate that they are actually required or represent an effective strategy for achieving sustainable growth across the District.

Appendix 1

