

**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW
EXAMINATION**

MATTER 7 | HOUSING PROVISION

Grass Roots Planning on behalf of Redrow Homes Ltd

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REPORT CONTROL

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1.0 INTRODUCTION

- 1.1 On behalf of Redrow Homes (SW) Grass Roots Planning have been instructed to make various representations to the emerging Local Plan for the District and specifically promote two sites in Stroud. These are land north of Charfield Road, Kingswood and land north of Hyde Lane, Whitminster.
- 1.2 Our involvement in these sites stretches back to 2020 when we made representations to the Council's 'Additional Housing Options' consultation. We have set out our representations as part of the previous consultation stages to the Local Plan; these represent our position on the plan and its constituent parts, but this statement seeks to elaborate on the issues and concerns we have raised and also responds to the Inspector's Matters, Issues and Questions (MIQs) set out in the December 2022 note.
- 1.3 This statement relates to Matter 7 which refers to Housing Provision, including the overall level of supply and five-year housing land supply.

Matter 7 – Housing Provision

Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound?

4. Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement?

- 1.4 As set out within our Matter 3 Hearing Statement, it is our view that the Housing Requirement currently being planned for is too low, in light of the standard method calculations and the fact that the authority will not be able to rely on the current figures from October 2023 onwards.
- 1.5 Our Matter 3 Hearing Statement considers that the authority should be planning for a higher housing figure (671 dwellings per annum) and accommodating this through additional planned growth, including allocating additional housing sites. Furthermore, we consider that this should comprise a range of smaller-scale sites rather than further strategic-scale development which we consider will take too long to come forward in the plan period and not boost housing supply in the first five years.

- 1.6 There is currently insufficient flexibility in the overall housing supply to accommodate this higher level of housing need.
- 1.7 Based on the submitted documents which relate to housing supply, published in 2020, the following figures are set out:

Calculating our residual housing requirement up to 2040 ▼			
Supply	A	Large sites commitments, at April 2020 (on sites with permission / under construction)	4,606
	B	Small sites commitments, at April 2019 (on sites with permission / under construction)	525
	C	Other firm commitments, at April 2019 (on sites subject to resolutions to grant permission)	84
	D	Total commitments (= A + B + C)	5,215
	E	Commitments (D) minus undeliverable sites	4,595
Requirement	F	Housing needs 1 April 2020 to 31 March 2040 (= 630 pa x 20 years)	12,600
	G	Minimum residual housing requirement to 2040 (= F - E)	8,005
		Allocated sites in Local Plan	9,065
		Small sites allowance (75 pa x 17 years)	1,275
		Total housing supply in Local Plan	10,340

Figure 1. Housing Requirement set out in Local Plan

- 1.8 However, as set out in Matter 3, we consider that the housing requirement (Parts F and G) should be updated to reflect the most up-to-date housing requirement. In our view this should be for 652 dwellings per annum in the first two years of the plan, with 671 dwellings for the remainder of the plan, equating to an overall minimum need of 13,382 dwellings between 2020 – 2040.
- 1.9 We note that the Council has published a document entitled ‘Housing Availability 2022’ which has not yet been submitted as part of the examination. This document sets out an up-to-date schedule of completions since 2020 and commitments from April 2022 onwards. An extract of this table is shown below in figure 2:

Table 2	Net dwellings
Completions between 01 April 2020 and 31 March 2021	745
Completions between 01 April 2021 and 31 March 2022	771
Total Completions	1,516
Large site commitments at 01 April 2022 (10+ dwellings)	3,174
Small site commitments at 01 April 2022 (1-9 dwellings)	418
Other firm commitments at 01 April 2022*	42
Total commitments as at 01 April 2022	3,634

Figure 2. Total Completions between 2020 – 2022 and commitments as of April 2022

1.10 The above table does not include a discount for the non-implementation of small sites, nor any ‘undeliverable’ large sites which are set out in the Local Plan Review submission document. In line with that set out in the Local Plan Review submission plan, we have discounted the overall commitments by 12% (previously 620 out of the 5,215 dwellings were discounted), equating to 3,198 dwellings.

1.11 Against the appropriate minimum housing requirement therefore, which we consider to be 13,382 dwellings between 2020 – 2040, the following supply and buffer is achieved:

	No. of Dwellings
Large Site Commitments	3,174
Small Site Commitments	418
Other Firm Commitments	42
Total Commitments	3,634
12% reduction to account for non-implementation of both large and small sites ($3,634/100*12 = 436$)	3,198
Completions (2020 – 2022)	1,516
Total Commitments + Completions	4,714
Housing Requirement (652dpa x 2 years, 671dpa x 18 years)	13,382
Minimum Residual Housing Requirement to 2040	8,668
Allocated Sites in Local Plan	9,065
Windfall	1,275
Total Housing Supply	10,340
Against Target	+1,672

Table 1. Anticipated Supply and Buffer against up-to-date Housing Requirement

1.12 Previously, the buffer calculated by SDC was nearly 3,500 dwellings which we consider as an overall buffer, would provide sufficient flexibility (albeit as discussed elsewhere, we do not consider the mix of sites to be appropriate with a heavy over reliance on large strategic sites in particular).

1.13 Accordingly, we consider that the revised buffer against the up-to-date housing requirement is marginal, and further sites should be allocated to compensate for this. Given the significant number of strategic-scale sites allocated within the pre-submission plan, it only takes one site to fall away before we the authority are found unable to meet their housing target, and as we have highlighted in respect to Wisloe and Sharpness the development trajectories assumed are not realistic and therefore will not deliver as many houses as anticipated. As such, we consider that additional smaller-scale sites, capable of delivering homes within the first five years, should be incorporated into the Local Plan.

1.14 With respect to the Inspectors’ query regarding 5YHLS, we have previously raised concerns regarding the level of strategic allocations proposed within the Local Plan Pre-Submission document and how this will affect 5YHLS, given that these large-scale sites account for 89% of the total anticipated planned (i.e. excluding windfalls) supply over the plan period. A mix and balance of sites is required, to ensure sufficient flexibility in the market for housing, to bring sites forward in a timely manner and to ensure there is a rolling 5YHLS.

1.15 Our prediction set out in our July 2021 representations was that by 2023, SDC would be unable to demonstrate a 5YHLS based on their existing commitments and allocations in the current Local Plan. This holds true, with the latest paper (December 2022) identifying the following in terms of anticipated total supply over the next 8 years:

22/23	23/24	24/25	25/26	26/27	27/28	29/30	30/31
779	1,023	721	718	519	335	310	196

Table 2. Extract of SDC’s predicted supply over the next 8 years

1.16 Based on the above figures, we have calculated the revised rolling 5YHLS position below. This is calculated by adding up the anticipated delivery over five years (rolling forward each year) and dividing this by the annual requirement including a 5% buffer (e.g. for April 2022 add the number of homes coming forward through years 22/23 to 26/27 together (3,760 homes) and divide by 705 (671 x 5 = 3,355 + 5% buffer = 3,523 / 5 = 705 homes per annum)):

Year	5YHLS Position
2022	5.3
2023	4.7
2024	3.7
2025	2.9
2026	2.2
2027	1.7

Table 3. Anticipated Rolling 5YHLS Position

- 1.17 This shows how the 5YHLS position will worsen over the coming years and as such, it is critical that a greater range of smaller allocations are incorporated into the plan that can replace inappropriate allocations such as Sharpness and Wisloe, in order to deliver homes in the first five years of the plan on less constrained sites that are not going to have such significant lead in times as these large, unsustainable in our view, projects.
- 1.18 As previously set out in our July 2021 representations (please refer to Table 1 and subsequent paragraphs), South Gloucestershire Council and Tewkesbury, Cheltenham & Gloucestershire have all repeatedly been found unable to demonstrate a 5YHLS throughout their respective plan periods, despite having a much smaller % of strategic scale allocations compared to Stroud's newest proposals. This has had a significant effect on deliverability and affordability across these authority areas.
- 1.19 Within the Pre-Submission Local Plan SDC have included a table of the allocations and their anticipated delivery rates across the plan period. An extract of this is shown below for ease of reference:

Source of housing supply	Projected delivery				Total supply
	2020 to 2025	2025 to 2030	2030 to 2035	2035 to 2040	
Commitments (2019)	3,840	755			4,595
Cam North East Extension		50	130		180
Cam North West	200	700			900
Hunts Grove Extension	166	550	34		750
Sharpness Docks	110	112	78		300
Sharpness new settlement		500	750	1,150	2,400
Stonehouse North West	100	375	225		700
South of Hardwicke		600	600	150	1,350
Wisloe new settlement	50	565	660	225	1,500
Local development sites	116	290	290	289	985
District Total	4,582	4,497	2,767	1,814	13,660
Small sites windfall	150	375	375	375	1,275

Figure 3. Extract of Anticipated Supply in the Pre-Submission Plan

- 1.20 We previously analysed the anticipated rates of delivery and whether it was likely that these sites would come forward in the first five years of the plan, based on the averages set out in the Lichfields 'Start to Finish' Paper (see Figure 6 of our previous representations) and the individual status of each site.
- 1.21 We have further reviewed our position set out in July 2021 and whether the proposed allocations have come forward as anticipated. In summary:

- Cam North-West – A hybrid application for up to 795 dwellings (including 231 detailed) was submitted in July 2021 and is currently pending determination (Application Ref: S.21/1875/OUT). A holding objection has been issued by National Highways regarding the impact on J14 of the M5 and it is unlikely that this will be resolved for some time.
- Hunts Grove Extension – Our position remains the same as previously set out within our July 2021 representations (paragraphs 4.16 – 4.19) in that it is unlikely these homes will be delivered within the first five years of the plan. No application has been submitted to date and the site forms part of a larger strategic allocation that is currently being built out elsewhere.
- Sharpness Docks – our position remains the same as previously set out in our July 2021 representations, which is namely that there are significant concerns with the allocation of this site and the constraints presented. It is highly unlikely that dwellings will be delivered in the first five years of the plan.
- Stonehouse – A detailed application is due to be submitted in Spring 2023. Unfortunately, there was a delay whilst the applicants (Robert Hitchins and Redrow Homes) were awaiting pre-application advice. Given that a detailed application is due to be submitted imminently, and therefore a significant number of dwellings will be delivered within the first five years of the plan.
- Wisloe – Please refer to paragraphs 4.32 – 4.34 of our previous representations which sets out our position on this matter, as well as our Hearing Statement in relation to Matter 5. We do not consider that our position has changed and this site is not a credible allocation to put forward in the plan.

1.22 As such, a considerable number of homes would be removed from the supply simply based on the data and analysis set out in Lichfield’s ‘Start to Finish Paper’ and accordingly, we consider that the rolling 5YHLS position would be seriously affected given that many sites will not be able to come forward within the first five or even ten years of the plan. There is a lack of credible evidence to demonstrate that these sites will come to fruition as planned by SDC, or even come forward at all, given viability issues. Inappropriate sites need to be removed from the proposed allocations and replaced with smaller scale development which can ‘plug’ the gap in supply in the first few years of the plan.

5. Is there credible evidence to support the expected delivery rates set out in the housing trajectory? The annual housing requirement of 630 dpa would be a significant rise in house building rates from recent and historic trends in the borough. Does the evidence support that this is achievable?

1.23 As the Inspectors have noted, the annual housing requirement would be a significant rise in house building rates compared to recent and historic trends. Data taken from the authority’s previous monitoring reports, including Housing Availability Papers and Housing Delivery Test Results (shown below in table 4), have identified the authority has only met the proposed housing target in 3 out of the last 11 years, and only within the last 2 years when the more appropriate housing figure is considered (671 dwellings per annum). As such, a step-change in housing delivery is required in order to deliver the number of homes required. Given the lack of credible evidence underpinning the delivery of some of the strategic sites included within the supply, particularly within the first five years, it is our view that smaller sites should be allocated which have a realistic prospect of delivering homes within five years.

Year	Number of Dwelling Completions
2011-12	402
2012-13	408
2013-14	477
2014-15	573
2015-16	430
2016-17	356
2017-18	501
2018-19	566
2019-20	666
2020-21	776
2021-22	771

Table 4. Completion Rates over the last 11 years in SDC

1.24 As we have set out in our representations (Section 4 of our July 2021 representations, as well as the Additional Housing Options representations (paragraphs 4.6 – 4.13)), we do not consider that there is credible evidence to support the expected delivery rates set out in the housing trajectory, largely due to the number of strategic sites which will take many years to come ‘online’, and actually begin to deliver housing.

1.25 We have been unable to find any evidence within the Local Plan itself which explains how the delivery rates have been calculated and what assumptions have been used to create the trajectory. Topic Paper ED8 confirms that *‘projected delivery is based on site promoter evidence, access provision and the number of delivery outlets for strategic development allocations’*, however does not delve any further into this.

1.26 Having reviewing the available site promoter material¹, we note the following in respect to individual allocations:

- Cam North-West: the DAS provided does not set out a trajectory for anticipated delivery rates.
- Hunts Grove Extension: No information is available on this webpage which identifies a trajectory. Having reviewed submitted material, it appears that the developer have not submitted any representations promoting the site for development.
- Sharpness Docks: There is no information available online outlining the anticipated delivery rates for this site.
- Sharpness New Settlement: The promoters document refers to 180 per year at maximum delivery rates.
- Stonehouse: Anticipated delivery rates have been set out in the promoter's position statement.
- Wisloe: There is no information available online outlining the anticipated delivery rates.

1.27 As such, we consider that for the majority of strategic-scale allocations, the evidence underpinning the trajectories to date is extremely limited. In our view, the trajectory put forward lacks credibility and it is more likely that sites will come forward much later in the plan period than anticipated, given their scale and in light of the information presented in Lichfield's 'Start to Finish' analysis.

¹ <https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/stroud-district-local-plan-review/local-plan-review-evidence/site-promoter-material-available-at-regulation-19-consultation-stage>



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