



Planning for our future

Draft Local Plan - Additional housing options consultation

1. Introduction

The following survey relates to the *Stroud District Local Plan Review: Additional housing options October 2020* which can be viewed at <https://www.stroud.gov.uk/localplanreview> (<https://www.stroud.gov.uk/localplanreview>)

In August 2020, the Government published a consultation document which proposed changes to the way the Government calculates minimum housing requirement for each local authority area in the country. This revised standard method has proposed increasing the requirement for Stroud District from the level set out in the 2019 Draft Local Plan of 638 homes per annum, to 786 homes per annum. If this new revised method is confirmed, a revised Draft Local Plan may have to identify further land within the District for housing.

The Council is therefore launching a narrow focused eight-week public consultation from 21 October 2020 to 16 December 2020 on additional housing options and sites, which could be brought into the emerging Local Plan, if required. We would also like your views on whether and how a reserve housing supply should be identified, in case any of the Local Plan's site allocations were to fall short on delivering the numbers of homes expected.

Making comments

Whilst we encourage responses to this consultation, please do not repeat comments that you may have made previously on other policies or sites which formed part of the Draft Local Plan, but which do not form part of this focused consultation. These previous comments will be taken into consideration and a report of consultation will accompany the final Draft Local Plan when it is considered in 2021.

You do not need to fill in every question. Once finished, please go to the last page to submit your response. There is an opportunity to print your response at the end of the survey so that you can

keep a copy for yourself. If you would like to save your response and return to complete it later then please press save and continue later at the bottom of the page.

The consultation will close on Wednesday 16 December 2020

Data Protection

Personal data is processed in accordance with the Council's Privacy Notice. Please see our Privacy Notice web page (<http://www.stroud.gov.uk/council-and-democracy/about-the-council/access-to-information/privacy-and-cookie-policy/privacy-notice>) Sections 1 to 10 and our policies (<http://www.stroud.gov.uk/council-and-democracy/about-the-council/access-to-information/privacy-and-cookie-policy/privacy-notice/18-planning-and-buildings-privacy-notices-and-retention-policies>) for details specifically affecting Planning and Building Control.

2. Your details

Name *

Your company or organisation

Your email address *

Client's name (if applicable)

Client's company or organisation (if applicable)

Which area/cluster of parishes do you identify yourself with (i.e. live, work, visit)? *

- Berkeley (Parishes of Berkeley, Ham & Stone, Alkington, Hamfallow, Hinton, Slimbridge)
- Cam & Dursley (Parishes of Dursley, Cam, Coaley, Stinchcombe, Uley, Nympsfield, Owlpen)

- Cotswold (Parishes of Painswick, Bisley-with-Lypiatt, Miserden, Cranham. Pitchcombe)
- Gloucester Fringe (Parishes of Hardwicke, Haresfield, Harescombe, Brookthorpe-with-Whaddon, Upton St Leonards)
- Severn Vale (Parishes of Arlingham, Fretherne-with-Saul, Frampton on Severn, Whitminster, Moreton Valence, Longney. Elmore)
- Stonehouse (Parishes of Stonehouse, Standish, Eastington, Frocester, Leonard Stanley, Kings Stanley)
- Stroud Valleys (Parishes of Stroud, Whiteshill & Ruscombe, Randwick, Cainscross, Rodborough, Brimscombe & Thrupp, Chalford, Woodchester, Minchinhampton, Horsley, Nailsworth)
- Wotton (Parishes of Wotton-under-Edge, North Nibley, Kingswood, Alderley, Hillesley & Tresham)
- Outside the District

3. Spatial Options: additional housing land

Qu.1a Would you support or object to Option A - "Intensify", if additional housing land is required?

- Support
- Object

Please explain your answer

See response to Question 1e below

Qu.1b Would you support or object to Option B - "Towns and villages", if additional housing land is required?

- Support
- Object

Please explain your answer

See response to Question 1e below

Qu.1c Would you support or object to Option C - "Additional growth point", if additional housing land is required?

- Support
 Object

Please explain your answer

See response to Question 1e below

Qu.1d Would you support or object to Option D - "Wider dispersal", if additional housing land is required?

- Support
 Object

Please explain your answer

A wider dispersal option would not be consistent with the objectives of national policy as set out in the NPPF.

Qu.1e Would you support or object to a hybrid or combination of options?

- Support Please answer Qu. 2 to explain which hybrid/combination of options you would support)
 Object

Please explain your answer

Pegasus on behalf of Robert Hitchins Limited welcome the consultation on the Additional Housing Options.

A hybrid option is supported for a number of reasons:

- The Government's objective is to significantly boost the supply of homes, in order to achieve this it is important that a sufficient amount and variety of land can come forward where it is needed, that meets the needs of groups with specific housing requirements and that land with permission is developed without delay.
- The most effective way of achieving delivery is to have a range and choice of sites.
- The Plan will be able to meet the size, type and tenure of housing needed for different groups in the community.
- It is noted that the Council have had to prepare a Delivery Action Plan (August 2019) to respond to the Housing Delivery Test (HDT) for Stroud published in February 2019 (this reflects the HDT measurement of 94% housing completions for the three year period 01 April 2015 to 31st March 2018. The Action Plan was required to reduce the risk of future under delivery. The under delivery reflected the lower delivery rates in the two year period 2015-2017 are attributable to delays to programmed delivery at major development sites at Littlecombe, Dursley and Hunts Grove, Hardwicke, due to infrastructure requirements, and detailed planning permission outstanding at Local Plan allocation sites at SA2: Land west of Stonehouse and SA3: NE Cam. Land West of Stonehouse {S.14/0810/OUT} was a Local Plan allocation promoted by RHL through the LP, a planning application was submitted and validated on 4th April 2014 and a decision was issued on 14th April 2016). It is noted that the Action Plan in Table 2 for the three years 2016 -2019 shows a marked increase above that required for the new three year period. Whilst the housing land supply measured against the adopted district housing requirement is well in excess of 5 years (8.95yrs Stroud Housing Land Supply October 2020) as the Local Plan is now more than 5yrs old, (i.e. since it was adopted in November 2015) the district housing land supply is measured against the District's housing need assessed using the current standard method. Based on the Local Housing Need Standard Method there is a 6.56 years supply. However, due to the COVID 19 pandemic the Council have not been able to undertake a full and comprehensive reassessment of the housing land supply, consequently the report provides an indication of how the land supply position may be changing in particular in relation to the standard method for assessing local housing need.
- As the revised standard method increases the housing requirement, this underlines the importance of including a range and choice of sites in the Plan to ensure delivery is met.
- It is noted that the SA accompanying the consultation on Additional Housing Sites Options recommends that the Council continues with a hybrid approach to the strategy.

Qu.1f Can you suggest another strategy / spatial option for the identification of additional housing land?

- Yes
 No

Please describe it

Qu. 2 If you answered yes to Q1e above, please select which of the spatial options (A-D) you would like to see combined in a hybrid strategy?

- Option A - Intensify
 Option B – Towns and villages
 Option C – Additional growth point
 Option D – Wider dispersal

Please explain why

A hybrid strategy enabling a wide choice and range of size of sites to meet housing needs can be met by a combination of Option A, B and C. There is some additional capacity at the towns and villages, for example:

Land West of Draycott (PS24), proposed in the emerging Draft Local Plan is supported as a sustainable location. Pegasus support the proposed allocation PS24 West of Draycott. The site is promoted by Robert Hitchins Ltd and Persimmon Homes and a joint submission was made at the last consultation on the Local Plan in January 2019. Submissions were also made in January 2020 in response to the consultation on the Draft Local Plan.

Cam is identified in the Local Plan as a Tier 1 settlement and is the second largest in terms of population. Together with Dursley it has the best access to key services and facilities of anywhere in the District. Land west of Draycott is a greenfield site and comprises approximately 35 hectares and will provide a suitable and deliverable extension to Cam.

Since submissions were made in January 2020 further technical work has been undertaken on the site and it is considered to have greater capacity than originally envisaged. The site was originally identified with a capacity of up to 700 dwellings, with a primary school, strategic landscaping and green infrastructure and associated community and open space uses. In our representations in January 2020 we indicated that the site could accommodate a minimum of 850 dwellings, but that the detail would be refined through the masterplan process. Further technical evidence has been undertaken as part of the preparation of a planning application which now indicates a capacity of approximately 950 dwellings.

Consequently as part of the hybrid approach consideration should be given to utilising the site in a more efficient way which would be consistent with the NPPF paragraph 122 of the NPPF, in particular, “ c) the availability and capacity of infrastructure and services – both existing and proposed ..” and the site allocation for approximately 950 dwellings.

Further work has also been undertaken to examine the approach taken by the County Council's to seeking education contributions and the Pupil Product Ratio (PPR) which is used by the County Council to support the contributions that are sort.

Gloucestershire County Council commissioned Cognisant Research to undertake a study to identify the product ratios experienced on new build developments in Gloucestershire. The resultant Pupil Product Ratio Study (PPRS) was published in 2018. In 2019, a supplementary report (the PPRS update) was prepared using the same methodology as adopted in the PPRS.

A wide range of stakeholders have raised significant concerns with the approach adopted and with the resultant product ratios of these reports. In light of this, Robert Hitchins Ltd commissioned NEMS Market Research to undertake a survey to verify the findings and address the omissions of the PPRS update. The findings of the County Council's approach and that which arises from the NEMS Market Research survey have been analysed in detail. The key points which emerge from the analysis are as follows:

- The County Council has applied the findings of the PPRS Update in a way that does not accord with the relevant guidance in numerous ways;
- The County Council unrealistically assume that contrary to the adopted Development Plans, 100% of dwellings will be permanently occupied;
- The County Council unrealistically assume that every resident child of 18 years or under in Gloucestershire will attend LEA funded childcare facilities, schools or sixth form facilities;
- The County Council unrealistically assume that 100% of children resident in a new build dwelling will change school as a result of the move to the property;
- The resulting product ratios of the County Council are unsurprisingly wholly out-of-keeping with any comparator;
- The resulting product ratios of the County Council if applied would immediately render adopted Development Plan policies out-of-date;
- The resulting product ratios of the County Council would trigger an immediate need to review the Development Plans and CIL Charging Schedules across Gloucestershire;
- The resulting product ratios of the County Council would require the housing requirements across Gloucestershire to be increased significantly to accommodate all of the assumed additional children once they become of household forming age;
- The resulting product ratios of the County Council if applied would undermine the viability and deliverability of the Development Plans across Gloucestershire;
- The resulting product ratios of the County Council if applied would also undermine the deliverability and soundness of emerging Local Plans; and
- The product ratios applied by the County Council (102 children per 100 households) are more than double those that arise from the NEMS Market Research survey (a maximum

of 45.7 pupils per 100 dwellings) that has been prepared in accordance with the relevant guidance.

- The County Council is currently applying a new formulaic approach which has not been subject to examination and is therefore clearly contrary to national guidance.

In view of the above analysis Pegasus has considered the educational needs arising from this proposed development in order to inform the need for on-site and off-site educational infrastructure, and to advise on how these will be funded.

A report has been prepared which reviews the existing and forecast educational capacity and considers the legal and policy context to determine how any residual needs are to be secured in respect of land west of Draycott.

In terms of the need for primary school places, the available evidence indicates that there are forecast to be almost a sufficient number of places across the planning area to accommodate the needs arising from the proposed development i.e. based on approximately 950 dwellings. On this basis a 2FE primary school of 420 places as required by the County Council could not be justified. Consequently, if this approach is accepted then the site could accommodate a greater number of dwellings than originally envisaged, thus making a contribution to the hybrid approach to accommodating the increase in the number of dwellings required based on the Government's proposed changes to the standard method. Increasing the number of dwellings at a Tier 1 settlement is consistent with the strategy. The site is suitable, available and a deliverable site for development due to its location, access to services and facilities, limited physical constraints that can be brought forward for development without harm to biodiversity of heritage assets.

4. Spatial Options: a reserve housing supply

Qu.3 Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

- Yes
- No - you should start an immediate review of the Plan instead
- No - other option (Please specify)

Whilst the identification of reserve sites was recommended by the Local Plans Expert Group in 2016, this approach was not included in the revised NPPF in 2019. Consequently, the concept of reserve sites is not supported. The approach outlined in the NPPF is to ensure that provision is made to support the Government's objective to significantly boost the supply of homes; in order to do this it is important that a sufficient amount and variety of land can come forward where it is needed.

In accordance with the NPPF, Plans need to be prepared positively, in a way that is aspirational but deliverable. Para 23 states that *"Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area." My emphasis.*

The tests of soundness require plans to be positively prepared i.e. *"providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs."*

The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

"The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates". Paragraph: 010 Reference ID: 2a-010-20190220

The housing requirement is often referred to as "at least" or a minimum. It is considered that more sites should be allocated than the minimum.

By adopting this approach and facilitating sites to come forward this would accord with the NPPF para 11, para 36 and para 60 and the PPG, in particularly in para 67 of the NPPF which states that the planning authority should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

Performance is monitored through the Housing Delivery Test and mechanisms are to be put in place to address any performance which fails to meet the requirements. The HDT is also one of a number of factors that are considered when determining the need to review the plan, along with whether the authority can demonstrate a 5 year supply of deliverable sites for housing and whether issues have arisen that may impact on the deliverability of key site allocations.

Generally Local Plans are to be reviewed at least once every five years and the review process is a method to ensure that a plan and the policies within remains effective. There will be occasions as referred to above and also where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise. This is to ensure that all housing need is planned for as quickly as reasonably possible.

Qu.4b Would you support or object to Option B - "Towns and villages", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).

- Support
 Object

Please explain your answer

Please see answer to Question 3 above. Reserve sites are not supported, instead more than sufficient sites should be allocated in the Plan in accordance with NPPF with paragraph 67 and to ensure a 5 year housing land supply etc. and that there is a significant boost to the supply of homes in the district in accordance with the NPPF.

Qu.4c Would you support or object to Option C - "Additional growth point", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site).

- Support
 Object

Please explain your answer

Please see answer to question 3 above. Reserve sites are not supported, instead more than sufficient sites should be allocated in the Plan in accordance with NPPF paragraph 67 and to ensure a 5 year housing land supply etc. and that there is a significant boost to the supply of homes in the district in accordance with the NPPF.

Qu.4d Would you support or object to Option D - "Wider dispersal", if a reserve site (or sites) is required? (please note, Option A - "Intensify" cannot be used as a means of identifying an additional reserve site)

- Support
 Object

Please explain your answer

Option D "Wider dispersal" is not supported as an option as it is not consistent with the NPPF, it would not support a sustainable strategy.

Qu.4e Would you support or object to a hybrid or combination of options in order to identify an additional reserve site (or sites)?

- Support (Please answer Qu. 5 to explain which hybrid/combination of options you would support)
 Object

Please explain your answer

See comments above in response to Question 3. As an objection is made to the concept of reserve sites, it is considered that the plan should include sites to provide sufficient flexibility to enable housing needs to be met.

Qu.4f Can you suggest another strategy / spatial option for the identification of a reserve site/sites?

- Yes
 No

Please describe it

See comments above in response to Question 3. As an objection is made to the concept of reserve sites, it is considered that the plan should include sites to provide sufficient flexibility to enable housing needs to be met.

Qu. 5 If you answered yes to Q4e above, please explain which of the spatial options (B-D) you would like to see combined in a hybrid strategy, and why?

- Option A - Intensify
 Option B – Towns and villages
 Option C – Additional growth point
 Option D – Wider dispersal
 No, I would support another option (Please specify below)

NOTE: if a site in the Local Plan does not come forward for development as expected, the a reserve site may be required. However, the "trigger" for allowing a reserve site or sites to receive planning permission needs to be clearly set out in the Plan, to avoid doubt or uncertainty. There could be a variety of triggers / reasons for bringing a reserve site into play.

Qu.6 What should trigger a reserve site (or sites) coming forward?

- A delay in an allocated Local Plan site receiving planning permission?
 Failure to deliver housing at the build rates set out in the Local Plan?
 Another trigger (please specify below)

Please explain your reasons

The principle of reserve site(s) is not supported. If such an approach were included it raises many questions in terms of what triggers a reserve site coming forward and if that site is regarded as a suitable site why should it be "restrained or delayed in any way" when there is a clear objective to significantly boost housing supply.

In order to overcome a possible situation where there is a delay to an allocated site receiving planning permission or housing delivery not coming forward as envisaged, having a wide range of sites included in the plan in excess of the minimum housing requirement will provide some flexibility.

5. Additional housing options - Potential sites

Qu.7a Do you support or object to the development of a site identified at: (BER016) Hook Street Farm, Lynch Road, Berkeley?

- Support
 Object

Please explain

It is noted in the SA that this site is recorded as containing areas of land within flood zones 3a or 3b and therefore a significant negative effect in relation to SA objective 12: flooding (red double negative).

There is no Flood Risk Assessment of this site or for BER017 as the Council's evidence base relates to the SFRA (Draft 2019) which only covers site PS33 in the Draft Plan and identifies the flood risk.

The Environment Agency mapping for flood risk shows the area as Flood Zone 3, with an area shown as flood defences running in a north /south direction to the west of Berkeley, running through the site. Therefore an objection is made to the site.

Qu.7b Do you support or object to the development of a site identified at: (BER017) Bevans Hill Farm, Lynch Road, Berkeley?

- Support
 Object

Please explain

The site is on greenfield land. An area of the site to the east lies within Flood Zone 3a or 3b but does not comprise more than 50% of the site's total area. However, in the absence of a SFRA, the Environment Agency provides information on the site – to the extent that the entire site would appear to be within Flood Zone 3 and the area benefits from flood defences. The SA only records this as a single negative.

It is considered that this site is not suitable for development.

Qu.7c Do you support or object to the development of a site identified at: (HAR017) Land at Sellars road, Hardwicke?

- Support
 Object

Please explain

HAR1 Land at Sellars Road which has the potential for 15 dwellings is well located in a sustainable location and adjacent to a recently developed site.

Qu.7d Do you support or object to the development of a site identified at: (STR065) Beeches Green Health Centre, Stroud?

- Support
 Object

Please explain

No comment, this site is a small site in Stroud which will contribute to the range and choice of sites.

Qu.7e Do you support or object to the development of a site identified at: (WHI012) Land south of Hyde Lane, Whitminster?

- Support
 Object

Please explain

There are other sites which have been promoted at the village of Whitminster which are considered to be better located in terms of access and relationship to the village –i.e. land east of School Lane and extending the proposed allocation west of School Lane.

Qu.8 Are there any other sites that you would like to be considered for future housing development?

- Yes, I would like to suggest a site.** Please describe the location and/or identify it on a map and explain your reasons. (Maps / files can be uploaded via this online questionnaire, after answering this question). Although we are keen to identify any sites with future potential, the Council has limited scope to pursue sites that are not actively promoted to us by a landowner or developer.
- Yes, I am a landowner / agent / developer and I would like to submit a new site.** If you would like to promote an alternative site that has not previously been considered as part of the Local Plan Review or Strategic Assessment of Land Availability (SALA), please also fill in the Site Submission Form that can be found at www.stroud.gov.uk/localplanreview - the form can be uploaded here or you can send it to us separately. (Please clearly identify in any accompanying email or letter that you have also responded via this online questionnaire, so that we can easily link the responses up).

Comments

File uploads Please upload any maps, supporting information or completed Site Submission forms here. Allowed file types include PDF, jpg, jpeg, doc, docx, xls, xlsx

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6. Potential growth points

Qu.9a Do you support or object to the development of Potential Growth Point 1 (PGP1) - Land at Grove End Farm, Whitminster. Including SALA sites WHI007 and WHI014. Potential for up to 2,250 dwellings, 13 hectares employment, local centre, primary school, community facilities and open space. Please explain why you support or object to the development of this broad location. If your comments relate to a specific site within the broad growth point area, please reference the SALA site number(s).

- Support
 Object

As part of a strategy which provides a range an choice of sites, PGP1 is supported.

Qu.9b Do you support or object to the development of Potential Growth Point 2 (PGP2) - Broad location at Moreton Valence / Hardwicke. Including SALA sites HAR015, HAR016, HAR006, HAR007, HAR008 and HAR009. Potential for up to 1,500 dwellings, employment land, local centre, primary school, community facilities and open space. Please explain why you support or object to the development of this broad location. If your comments relate to a specific site within the broad growth point area, please reference the SALA site number(s).

- Support
 Object

PGP2 is not supported as it appears a disparate grouping of sites that have not been promoted collectively.

Qu.10 Are there any other sites that you would like to be considered as a future growth point?

- Yes, I would like to suggest a location that I think you should consider.** Please describe the location and/or identify it on a map and explain your reasons. (maps / files can be uploaded via this online questionnaire, after answering this question). Although we are keen to identify any sites with future potential, the Council has limited scope to pursue sites that are not actively promoted to us by a landowner or developer.
- Yes, I am a landowner / agent / developer and I would like to submit a new site.** If you would like to promote an alternative site that has not previously been considered as part of the Local Plan Review or Strategic Assessment of Land Availability (SALA), please state the name of the site below and fill in the Site Submission Form that can be found at www.stroud.gov.uk/localplanreview - the form can be uploaded here or you can send it to us separately. (Please clearly identify in any accompanying email or letter that you have also responded via this online questionnaire, so that we can easily link the responses up).

Comments

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7. Sustainability Appraisal

Qu. 11 Please use the space below to provide comments on the Sustainability Appraisal that accompanies this consultation document?

Comments

Having read the SA and the assessment of the sites and the options, it recommends that the Council continue with a hybrid approach to the spatial strategy. Pegasus on behalf of RHL support this approach and consider that this best accords with the NPPF.