



Q3a. Do you have any comments on the housing trajectory presented in EB134 Housing Delivery?

1. Avant Homes continues to be concerned about the housing land supply situation in Stroud District, and the material provided does not change that position.
2. Starting with the Local Plan, Page 306 sets out the Plan's assumption on delivery. The graph shows that the delivery of housing is front-loaded in the plan period, tapering off from 2032 onwards, where delivery is below the annualised target. The graph is supported by Table 6, which shows the projected delivery from the strategic allocations and this shows:
 - Between 2020 and 2025 – 626 units will be delivered from strategic sites.
 - Between 2025 and 2030 – 3077 units will be delivered from strategic sites.
3. In comparison, the housing trajectory (EB134) on consultation shows:
 - Between 2020 and 2025 – 0 units will be delivered from strategic sites.
 - Between 2025 and 2030 – 1577 units will be delivered from strategic sites.
4. This represents a shortfall of **2126** units compared to the assumptions made in the Reg 19 version of the Local Plan.
5. This analysis highlights Avant Homes' consistent concerns about the overall delivery of housing through the Plan period. These concerns are linked to the Plan's strategy, which places an over-reliance on the delivery of strategic sites.
6. It shows that the Council's initial assumptions in formulating the Plan are wholly unrealistic. Consequently, the Plan fails to meet the soundness test of effectiveness and the guidance in paragraph 60 of the NPPF, which concerns "significantly boosting" the housing supply. This shows that the key strategic allocations are not coming forward anytime soon to the levels anticipated originally by the Plan.
7. Matters are further complicated by the difficulty of presenting the data, as it is not possible to read this data in the context of the overall supply picture provided by other Council documents, such as the January 2024 Housing Trajectory.

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Year	EB134	Jan 24 Trajectory	Difference
25/26	841	740	101
26/27	963	847	116
27/28	805	606	199
28/29	865	375	490
29/30	996	375	621
Totals	4470	2943	1527

8. This shows that the consultation document is currently overestimating the actual levels of delivery compared to the Council's housing trajectory data.
9. Turning to the Site Allocations, Avant Homes wishes to make the following observations about the sites listed for those commencing delivery in the next 5 years (period 2025/26 to 2029/30). Essentially, the concerns relate to the start date for delivery on the allocations. What follows is a site-by-site commentary.
 - PS24 – No application in with the Council, and what certainty does it have that delivery will actually commence on 26/27? This will require the submission of a major application, potentially EIA. It is unrealistic to expect it to deliver in the next 5 years (- 322 units from the trajectory as a minimum)
 - PS30—There is no application in with the Council. What certainty does it have that delivery will actually commence on 26/27? This will require the submission of a major application, potentially an EIA. (-100 units)

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- PS34 – The site is not subject to a planning application, and planning permission was refused in March 2024. No Appeal has been submitted. (-45 units)
 - PS36 – It is assumed that the site will deliver 155 units in the first year of development. This does not reflect a lead-in period, which has been evidenced in the other strategic site allocations. It would be more realistic to assume 50 dwellings in the first year of delivery. (-105 units)
 - PS37 - No application in with the Council – what certainty does it have that delivery will actually commence on 26/27? This will require the submission of a major application, potentially EIA, which will take time to deliver. (-125 units)
10. This removes 697 units from the trajectory’s anticipated delivery of 1577 units from the Strategic Sites housing trajectory. The following should be noted when turning to the local site allocations.
- PS02 – Brimscombe Port The trajectory anticipates 150 dwellings being delivered in the next 5 years. It is understood that the Council has signed an agreement with St Modwen Homes which anticipated an application being submitted in 2022. No such application has been submitted. Given the level of works required for the site (including a new dock basin) it remains to be seen (unless evidence is available) that these units can be delivered in the timeframe. (-150 units).
 - PS06 – the site has the benefit of an outline planning application currently pending determination. However, its redevelopment is tied to providing a new football stadium for Forest Green Rovers at Eastington. The stadium has yet to be delivered and there is no timetable for the stadium’s completion (-90 units)
 - BER016/17 – Currently the subject of an EIA screening request for a proposed development of up to 70 dwellings (allocation was for 60). Screening request includes land outside of the allocation. Delivery anticipated 25/26 and this is doubtful given that there is no application in.
11. The recent Appeal decision in respect of PS41 and the granting of planning permission on PS45 shows that Local Site Allocations can come forward in advance of the Local Plan. Given the concerns on the trajectory, Avant recommends that the strategy is revisited

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with a need to increase the number of smaller, non-strategic sites to make up the shortfall in provision.

Q3b. In order to assist the examination, the Inspectors would like a summary of your comments to Q3a (Please do not exceed 250 words).

12. Avant Homes has reservations about the housing trajectory and the robustness of the assumptions made regarding the deliverability of the strategic sites within the Plan period.