

## Home Builders Federation

### Matter 3

#### STROUD LOCAL PLAN EXAMINATION

#### Matter 3: Housing need and requirement

***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

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?

This is for the Council to answer.

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?

Whilst this is for the Council to answer the HBF would encourage the Council to use the uncapped figure as the housing requirement for the Borough.

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?



Consideration should have been given to using the uncapped LHNA as the minimum number of homes that should be delivered by the Council. As the inspector's question notes, PPG states that the cap does not reduce housing needs itself but is applied to "ensures the minimum local housing need figure calculated using the standard method is as deliverable as possible". This would suggest that where the uncapped LHNA is deliverable then this should be used as the housing requirement for the area. As set out in our representations it is also necessary to note that the Council has seen completions in recent years that have exceeded the capped requirement. PPG states at paragraph 2a-010 that past rates of delivery should be taken into account, and we would suggest that the evidence indicates that the Council should use the uncapped housing LHNA as their housing requirement.

### **Gloucester's unmet housing need**

3. What progress has been made to finalise the above SOCG and submit a signed version?

For Council

4. Based on the submitted evidence are we correct in our understanding that Gloucester City's housing needs, housing land supply and level of any unmet housing needs have yet to be confirmed and examined? How far have these assessments progressed?

For Council

5. What stage is the JCS Review currently at and what is the timetable for its production and examination?

For Council

6. The Plan states that the 2017 adopted JCS recognises that 'Gloucester City has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9'. National policy states that local plan policies are required to be reviewed within five years of adoption of a plan. In this context, and if the level of any unmet housing need is uncertain at this stage, why does the Council consider it necessary to allocate/safeguard land that may or may not be required?

Whilst this is for the Council to answer the HBF considers it important that planning for the unmet needs of neighbouring areas is not delayed unnecessarily. PPG sets out at paragraph 61-022 that inspectors will expect to see that strategic policy making authorities have addressed strategic matters and not deferred them to subsequent plan updates. Therefore, whilst Gloucester may be able to meet its needs in the short to medium term it should not be left to future reviews to address these needs. It should be addressed in this local plan.

7. Provision for designating safeguarded land is set out in paragraph 143 of the Framework and is in relation to the removal of land from the Green Belt. The site proposed to be safeguarded under Strategic Site Allocation Policy G2 is not in the Green Belt. The safeguarding of land would normally imply that, at least in principle, the development of the site was justified. But the caveats in the policy mean that determining whether the site is justified or not, will be determined at a later date. Yet confusingly the site is also identified within a strategic site allocation policy. Can the Council clarify its position on this and explain how its approach in the Plan in this regard, is justified, effective and consistent with national policy?

For Council

8. When will it be determined whether the site at Whaddon would be required and when it would be consistent with the 'approved strategy' of the JCS Review? Would this be at the point of adoption of the JCS Review? Does the Plan clearly set this out and does this justify the need to allocate/safeguard this site now?

For Council

9. Overall, is the inclusion of land at Whaddon to meet the needs of Gloucester justified, effective and consistent with national policy?

The HBF would support the allocation of land to meet the unmet needs of Gloucester.

### **Housing requirement**

The PPG advises that the standard method identifies a minimum annual housing need figure, but states that it 'does not produce a housing requirement figure.' The Plan, through Core Policy CP2, states that 'Stroud District will accommodate at least 12,600 additional dwellings....to meet the needs of the District for the period 2020-2040'. This is the same amount as the capped standard method figure for need set out in the Plan.

10. Is the identified housing requirement of at least 12,600 additional dwellings justified and consistent with national policy? Does the Plan clearly set out in policy both the overall housing requirement for the plan period as a whole, and the requirement that applies in each year of the plan period?

As set out above the HBF considers that it is necessary for the Council to plan for the uncapped housing need. However, in addition the Council should take account of paragraph 61 of the NPPF which states that any needs that cannot be met within a neighbouring area should also be taken into account when establishing the amount of housing to be planned for. Therefore, if the Council has identified that it intends to deliver 3,000 homes to meet the needs of Gloucester City then these should be included within the overall requirement set out in the local plan.

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?

See response to question 2.

12. The LHNA considers that the jobs growth forecast aligns with the resident worker forecasts, so there is no need to increase the housing requirement above the minimum figure identified by the standard methodology. Is this approach justified?

No comment

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?

For Council

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?

The additional supply being proposed should increase the number of affordable homes delivered over the plan period, however given that the viability evidence indicates that the onsite delivery of such housing will not be able to exceed 30% the Council will still fall well short of the 424 affordable homes require each year to meet needs. The overall unadjusted affordable housing need of 424 dwellings per annum represents 67% of LHN and whilst the HBF would not expect the Council to meet this level of need it should have been a key consideration in setting a higher overall housing requirement in order to try and better meet the identified need for affordable homes. Such an approach would be consistent with PPG, which states at paragraph 2a-024 that an increase in the total housing figures may be considered where it could help deliver affordable housing and would provide more resilience in the local plan given the expectation that affordability will worsen over the plan period.

15. The housing requirement of 'at least 12,600' dwelling housing requirement does not include the 3,000 dwelling contribution that the Plan is proposing to help meet Gloucester's unmet housing needs. Notwithstanding our previous questions on the soundness of meeting unmet needs, why does this contribution not form part of the

housing requirement figure? Is this approach consistent with national policy and guidance?

As set out above paragraph 61 clearly indicates that any unmet needs being planned for should form part of the housing requirement. If they are not included in the overall requirement, then there are no consequences from the failure to deliver these homes and no certainty that they will be delivered.

16. To provide clarity for future decision-makers the Plan should clearly identify and distinguish between the objectively assessed housing need, the standard method figure, the housing requirement, and the level of provision in the housing requirement to help meet the unmet needs of Gloucester City. Does the Plan do this?

Our main concern is that the homes to be delivered to address some of Gloucester's unmet needs are not included in the housing requirement.

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?

b. Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?

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

No comment

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