

**REPRESENTATION TO
STROUD DISTRICT LOCAL
PLAN REVIEW 2019 ON
BEHALF OF PIPER HOMES**



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Site: Land at the Knapp, Minchinhampton

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1 INTRODUCTION

1.1 This is a submission to the Stroud District Local Plan Review, which is subject to consultation until 22 January 2020. It is made on behalf of Piper Homes Ltd.

1.2 This representation sets out to address the following questions as outlined within draft local plan.

- *Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?*
- *Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?*
- *Are any further changes to the proposed policies necessary? Are there specific things that should be included in supporting text?*

1.3 We have considered the document as it now stands and have also considered the policies being proposed. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the Examination stages.

Structure

1.4 The remainder of this representation sets out to address the questions detailed above, the suggested amendments to policies are set out in the order that the policies appear within the Draft Local Plan along with a justification for the inclusion of the site: land at The Knapp, Minchinhampton. We have used the Draft Plan numbering system for policies and paragraphs, as relevant, in order to assist officers. We have commented on the following:

Table 1 Policies and Paragraphs

Paragraph	Policy	Page
2.15		26
	CP2	48
	CP3	49
	CP9	151
	HC4	154

2 REPRESENTATION

- 2.1 The remainder of this representation provides our comments on the questions set out within the document, along with comments on supporting text or proposed policy wording, as follows:

Do you support the Council's preferred strategy for meeting Stroud District's future growth and development needs?

- 2.2 We consider that further allocations should be made in sustainable locations in order to maintain a flexible supply of housing land.
- 2.3 In particular, we consider that the imminent failure of the West of England Joint Spatial Plan (JSP) is likely to have an impact on neighbouring authorities including Stroud, because of significant delays in housing delivery within the region that are likely to ensue. We would therefore urge the Council to take some account of this through the provision of additional allocations, together with potential reserve sites. We consider the Council's Duty to Cooperate would not be discharged simply because they are not directly involved in the JSP.

Paragraph 2.15

- 2.4 We are broadly supportive of the position of Minchinhampton's position as a Local Service Centre within the settlement hierarchy, and the proposed strategy as follows: *'In order to meet wider development needs and to support and improve existing services and facilities at smaller towns and larger villages, modest levels of growth will be delivered at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick'.*

Core Policy CP2 – Settlement Hierarchy

- 2.5 We consider that the cumulative totals, reflecting allocations to the higher order tier of settlements should be more flexibly-worded, to reflect the 'at least' OAN figure of 12,800 dwellings to meet the needs of the district from 2020 to 2040. This figure would of course exclude the 2,500 proposed to meet the needs of adjoining Gloucester City (land at Whaddon) as it would contribute to their housing land supply calculation. We would therefore question the total allocation figure on identified sites within the plan period of 8,725 as being too low. This is because we consider the overly-positive assumptions on 'commitments' leave the council at risk of some sites not coming forward. The council rely on a number of major sites with outline planning permission or are 'firm commitments' without any obvious justification. We would also question the reliance on brownfield sites which are unlikely to deliver affordable housing or other planning gain and should therefore site outside of the supply.

The council also appears to be fairly reliant on windfalls – which run to a total of around 1,350 new homes over the plan period and commitments run to well over 5,000 homes. The council assume that all of the 5,000 dwelling ‘commitments’ will deliver within the first 5 years of the plan (including 749 in 2019). We would dispute this, as it is clear the council rely on a number of sites that do not have detailed planning permission (or indeed any planning permission) and there is no evidence within the draft plan that clearly demonstrates that all such sites will deliver within the short term. Linked to this, there does not appear to be a lapse rate applied to this so-called supply. This clearly points to a clear opportunity to allocate more sites, which would address some of this potential risk and would also reinforce the plan-led approach.

- 2.6 The projected delivery Table 6 and associated graph on Page 193 show the council's assumptions on delivery rates. The assumptions on delivery are, in our view, highly aspirational and are heavily geared towards the early stages of the plan period. They would require a considerable step-change in delivery rates including both existing commitments and proposed allocations without any obvious justification or specific strategy setting out how this could be achieved.
- 2.7 The Annual Monitoring Report (2019), at Page 13 (Net Completions by Parish) clearly demonstrates that the Council have only managed to achieve an annual delivery rate of 437 dwellings between 2006 and 2019. Whilst this may have been against a lower annual requirement, there is no evidence that the Council could genuinely deliver over 1,000 dwelling completions per annum, nor a rate in excess of 800 dwellings (where the assumption is that this would be the rate for 50% of the plan period). This reinforces the need to allocate more housing sites, particularly non-strategic sites with less reliance on infrastructure and a faster build out time.
- 2.8 We consider the planned trajectory should be more realistic, accommodating a reasonable lapse rate, lead-in times (particularly for strategic sites) and reflect genuine build-out rates, not necessarily what developers say may happen. We would encourage the council to verify their information on built out rates per sales outlets independently. We consider this alone would mean allocating more rather than fewer sites.

Core Policy CP3 Tier 2 – Local Service Centres

- 2.9 For the reasons already given, we would welcome additional flexibility to Tier 2 settlements, simply because of the range of services and facilities they offer, together with the somewhat limited growth that (in particular) Minchinhampton has had over recent years.

Core Policy CP9

- 2.10 We are broadly supportive of the proposals to deliver affordable housing through market-led schemes and exceptions sites. Given the relatively poor levels of affordable housing delivery in the last 3 years (2016-19) at around 118 dwellings per annum, against an unadjusted affordable housing requirement of 425 dwellings per annum, it is abundantly clear that the situation will continue to worsen without effectively a 'presumption' in favour of affordable housing being set out within the policy. This policy is where we consider such a presumption should be made clear and we would therefore suggest it is re-worded.
- 2.11 If hurdles are put in the way of affordable housing development to meet local needs – such as requirements to prove need that require full cooperation from existing local residents (who are rarely in affordable housing need to begin with), then delivery rates will be poor. We would therefore suggest that caution is exercised on how the council feel rural exception schemes should be delivered through the planning process.

Delivery Policy HC4 – Local Housing Need (Rural Exception Sites)

- 2.12 We would encourage the council to consider delivery when it comes to such sites, adjacent to the SDLs, as they may require grant funding to ensure they are deliverable. Flexibility in the approach to securing the affordable housing may need to be discussed further, in light of the changing requirements set by Homes England.
- 2.13 We would also refer you to our comments earlier in relation to hurdles associated with proving local affordable housing need. Local need should be expanded and should not simply relate to the existing settlement – we would encourage the consideration of local need including neighbouring parishes in order that those living outside of an area, but with a justification (i.e. local link) to live there could be accommodated more easily. This would then translate into parishes cooperating to ensure local people do not have to move significant distances from where they grew up, work or have family links.

3 THE SITE AND PROPOSALS

3.1 This section sets out details of the site to which this representation relates and responds to the below question, as follows.

Are there any additional issues or constraints relating to the proposed sites? And how should specific constraints, needs and opportunities be reflected in the final site allocation policies?

3.2 We note the proposed allocation of site PS05 in Minchinhampton, for up to 80 dwellings. However, we also note that there is an acute housing need within the tier 2 settlement of Minchinhampton, and feel that additional sites should be brought forward to address significant inequality in terms of house prices and the range and tenure mix available for local people or those with a link to the area.

3.3 Given the size of Minchinhampton as a tier 2 settlement, we feel that the settlement is highly capable of accommodating further growth, and we would reinforce the opportunity at The Knapp which continues to be promoted by Piper Homes.

3.4 Detailed below is a map of the site and surrounding area in context to Minchinhampton:



Figure 1 Site Outline

3.5 We have considered the landscape appraisal and strongly believe that the site could be developed via a landscape-led proposal which takes account of the ZTV from key points

within and across the valley. The site is clearly locationally sustainable and within walking distance of a number of services and facilities within Minchinhampton.

- 3.6 Piper Homes are considering a scheme which will offer a good mix of house types and tenures, including a substantial number of affordable homes. Piper would also incorporate allotment gardens and shared spaces for local people to meet, reinforcing social cohesion and cooperation. These spaces would also reinforce key views to the wider valley beyond.
- 3.7 We will, in due course, submit the landscape evidence and early masterplan for the site, which reflects the evidence base we have gathered so far. We firmly believe the site constraints are no limit to a proportionate development from coming forward in the short term.
- 3.8 **A copy of the indicative site plan for the proposal is appended to the document in Appendix A, and gives indication to how the site could look, if developed.**

