

**STROUD DISTRICT COUNCIL
EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN
INSPECTOR'S VIEWS ON FURTHER MODIFICATIONS TO THE SUBMITTED
LOCAL PLAN RELATING TO THE OBJECTIVE ASSESSMENT OF HOUSING NEED
AND PROPOSED HOUSING REQUIREMENT FIGURE**

1. A considerable amount of evidence has been submitted by the Council and other participants about the objective assessment of housing need, including the relationship with housing and economic factors and the housing requirement figure that should be included in the Stroud District Local Plan. Following the discussions on these matters during the various stages of the examination (both at the Stage 1 original and resumed hearings and the Stage 2 hearings), I have now formed a view about the appropriate housing figure to include in the Plan.
2. In the submitted Local Plan, a figure of at least 9,500 additional dwellings (2006-2031) was proposed, based on the 2011-based household projections. However, the Inspector's Initial Conclusions¹ highlighted several concerns about the approach and methodology used in establishing the objective assessment of housing need and the housing requirement figure. As a result, the Council agreed to suspend the examination and to undertake further work on this matter. In December 2014, on the basis of an updated and revised assessment of housing need, the Council resolved to support a new housing requirement figure of 11,200 (2006-2031)². Subsequent work has been undertaken to assess the implications of the latest 2012-based household projections, review the need for affordable housing and review the economic factors, including aligning the housing requirement figure with the alternative job scenarios³. This work concluded that the amended housing requirement figure of 11,200 dwellings would be slightly below the mid-point of the various job growth scenarios (which estimated a requirement for between 10,600-12,200 dwellings). The figures put forward by participants at the examination broadly ranged from around 11,000 to higher figures of 12,200 or more dwellings.
3. Following the discussions at the hearing sessions, I asked the Council to look at two alternative scenarios, based on the mid-point and upper-point of these job scenarios (either 11,400 or 12,200 new dwellings)⁴. There seems to be general agreement that the demographic need for new housing based on the latest 2012-based household projections is around 11,000 dwellings. However, some uplift is needed to reflect the relatively high need for affordable housing (446 units/year (unadjusted) and to ensure there are sufficient economically active people to take up the 6,800-12,500 new jobs estimated by the latest economic forecasts. Having considered all the evidence, discussions and representations, I conclude that the Council should include a housing requirement figure in the Local Plan of an absolute minimum of **at least 11,400 new dwellings** (2006-2031) within Core Policy CP2 and the associated text, calculations and housing trajectory; the provision of 950 additional bedspaces in Class C2 care homes is in addition to this figure. This figure would represent the mid-point of the job scenarios, as well as providing a modest uplift to the demographically assessed housing need in order to reflect the need for affordable housing and align better with the economic growth strategy.
4. In line with the guidance in the NPPF (¶ 14), I have also considered the overall capacity for housing development within Stroud district. Although there are significant swathes of the Cotswolds Area of Outstanding Natural Beauty within the district, along with other constraints (such as flood risk, landscape and sustainability issues), unlike neighbouring areas, there is no Green Belt within the district. From the evidence provided by the Council, using sites already identified in the submission Plan (including the proposed West of Stonehouse site), it would seem that a minimum of 11,400 dwellings could be delivered in the period to 2031 without any further changes to the Plan. With further changes to the submitted Plan, including increased housing provision at Hunts Grove extension (+250) and North-East Cam (+300), a figure just short of 12,200 dwellings could be delivered.

¹ Examination document: PS/D21

² Examination document: PS/E12

³ Examination document: REX/B17; Table 2

⁴ Examination document: REX/D05

5. The increased provision at Hunts Grove extension could be delivered within the existing proposed allocation, with a small increase on the south-western boundary to "round-off" this development area⁵. However, I understand that increased provision at North-East Cam could require additional land and further supporting development (such as a primary school) which has not been fully investigated. It will be for the Council to decide whether to amend the boundary of this allocation to enable this additional capacity to be provided, as well as to reflect the latest suggestions of the prospective developer (including an employment element at the northern end of the site). However, increased allocations at North-East Cam and Hunts Grove extension would not be necessary to meet the 11,400 dwelling figure. Nevertheless, I consider the proposed allocation at Hunts Grove extension should be increased to 750 dwellings, to provide flexibility in the delivery of new housing as well as providing certainty in the longer term about the ultimate extent of this development area.
6. Although alternative levels of housing requirement have been debated at the hearing sessions, the revised figure would need to be subject to the Main Modifications procedure and the associated sustainability appraisal and public consultation. This can be undertaken as part of the consultation and sustainability appraisal related to other amendments to the Plan as currently envisaged. The full reasoning for my recommendations on this matter will be included in my final report to the Council.
7. In forming my views on the most appropriate level of new housing development to be provided within Stroud district, I am aware of the current discussions taking place during the examination of the Joint Core Strategy (JCS) for Gloucester, Cheltenham & Tewkesbury. The submitted JCS aims to fully meet its housing needs within the area of its plan, without requiring any other authority to assist in meeting any unmet needs. However, it is apparent that the Inspector examining this plan has requested the JCS authorities to undertake some further work on the housing, employment and retail strategy of the submitted Plan, and it is likely to be some time before these matters are finally resolved. Consequently, I consider it would not be in the best interests of establishing an up-to-date planning framework for Stroud district to delay the examination of the Stroud District Local Plan any further than is necessary at this time, particularly since the Plan already includes a commitment to early review if this proves necessary.
8. I would welcome confirmation from the Council that the recommended housing provision figure will be included in the amended Plan, subject to the consultation and sustainability appraisal procedure already envisaged. However, I confirm that this does not pre-empt or pre-judge my final conclusions on the soundness of the submitted Local Plan, which will be confirmed after formal consultation has been undertaken as part of the Main Modifications procedure.
9. This note is issued to provide guidance to the Council on the appropriate housing requirement figure to include in the Stroud District Local Plan. It is being published for information only, but is not open to comment from other parties, since they will have the opportunity to respond to these matters when the Plan is subject to consultation as part of the Main Modifications procedure.

Stephen J Pratt - Development Plan Inspector
3 July 2015

⁵ Examination document: PS2/D07