

**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW
EXAMINATION IN PUBLIC (EiP)**

MATTER 3 | HOUSING NEED & REQUIREMENT

FEBRUARY 2023

Grass Roots Planning on behalf of Redrow Homes Ltd

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1.0 INTRODUCTION

- 1.1 On behalf of Redrow Homes (SW) Grass Roots Planning have been instructed to make various representations to the emerging Local Plan for the District and specifically promote two sites in Stroud. These are land north of Charfield Road, Kingswood and land north of Hyde Lane, Whitminster.
- 1.2 Our involvement in these sites stretches back to 2020 when we made representations to the Council's 'Additional Housing Options' consultation. We have set out our representations as part of the previous consultation stages to the Local Plan; these represent our position on the plan and its constituent parts, but this statement seeks to elaborate on the issues and concerns we have raised and also responds to the Inspector's Matters, Issues and Questions (MIQs) set out in the December 2022 note.
- 1.3 This statement relates to Matter 3 which refers to the overall Housing Need & Requirement for Stroud District Council.

Matter 3 – Housing Need & 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?

1. The capped standard method minimum figure in the Plan at 630 dpa is lower than the 638dpa figure set out in the LHNA. Can the Council point us to the document that sets out the reasoning for this please?
- 1.4 In our view, there is no justification for a lower capped figure than the 638 dwellings set out and as we go onto explain under Question 10, we actually consider that the Council should be applying a higher housing figure that reflects the latest standard method calculations.
 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?

1.5 Chapter 2.5 of the Pre-Submission Local Plan and Core Policy CP2 does not provide for any arrangements to ensure that the higher housing need above the capped level will be planned for. In our view this should at the very least require an early review of the requirement reflected in policy; however, the preferred option as explained further below would be to plan for this higher housing requirement now and allocate additional land to deliver the housing required in the local area.

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?

1.6 The supporting work, including the Sustainability Appraisal, does not appear to have considered whether a higher level of housing need has been considered and the effects of this on the local area. For the reasons set out below, we consider that a higher housing requirement should be planned for now with additional land allocated including a mix of smaller sites to provide a more substantive buffer to the supply.

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?

1.7 Having reviewed the various documents submitted with the Local Plan, we do not consider that the identified housing requirement of at least 12,600 dwellings is justified and consistent with national policy.

1.8 Firstly, as the Inspectors have noted, the Local Housing Needs Assessment (LHNA) paper (Ref: EB10) September 2020 calculates the minimum number of homes generated as 638 dwellings per annum, resulting in a requirement of at least 12,800 dwellings over the plan period 2020 – 2040. As such, in the very minimum, the authority ought to have been planning for an additional 200 dwellings over the plan period from the beginning of the plan-making stages.

- 1.9 Secondly, we note paragraph 8 of the Executive Summary of the LHNA September 2020, which states the following:

‘The LHN figure for Stroud district is capped at 40% above the latest housing requirement given that the plan was adopted within the last five years; however, if the new plan is not submitted by November 2020, then the strategic policies for housing will no longer be considered up-to-date and the applicable cap will change, which would increase the minimum LHN to 652dpa based on current figures’.

- 1.10 We are not aware of any changes to the guidance for calculating the standard method which would affect the conclusion set out above – therefore, as the Plan was not submitted for examination until October 2021, it is our view that the cap no longer applies and therefore, at that stage, a minimum of 652 dwellings per annum should have been used to calculate the housing requirement, resulting in a requirement of 13,040 dwellings over the plan period 2020 – 2040.

- 1.11 Lastly, one also has to be mindful of the time that has elapsed since the Local Plan was submitted for examination, and relevant Planning Practice Guidance (PPG) which sets out the following:

When should strategic policy-making authorities assess their housing need figure for policy-making purposes?

‘Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

*The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities. However, **local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination’.** (our emphasis)*

[Paragraph: 008 Reference ID: 2a-008-20190220]

[Revision Date: 20 02 2019]

- 1.12 Furthermore, Paragraph 012 of the Housing and Economic Needs Assessment guidance on PPG states:

How can plan-making authorities apply the method to the overall plan period?

‘The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period.

*The National Planning Policy Framework requires strategic policies to look ahead over a **minimum 15-year period from adoption**, although authorities are required to keep their policies under review’. **(our emphasis)***

[Paragraph: 012 Reference ID: 2a-012-20190220]

[Revision Date: 20 02 2019]

- 1.13 Therefore, the authority is only able to rely on the current standard method calculation until October 2023 (regardless of whether this is the 630 figure, 638 figure or 652 figure referenced in the supporting evidence base).
- 1.14 The ‘Planning for the Future’ Paper identified in 2020 that *‘the average time taken from plan publication to adoption rose from an average of 450 days in 2009, to 815 days in 2019’*. It is unclear whether, since the adoption of the standard method, this figure has decreased. Given the delays in the examination period, and the need to undertake hearings in both March and May 2023, it seems unlikely that the Plan will be adopted by this point. This is because, whilst the authority considers their Plan sound, for reasons we have set out in our previous representations and within these Hearing statements, we consider that changes will be required to the Plan in the form of minor modifications and/or main modifications . This will be subjected to various rounds of consultation.
- 1.15 Accordingly, the new standard method figure based on the most up-to-date available evidence, is 671 dwellings per annum.
- 1.16 Whilst the authority can rely on the figures until October 2023, it is our view that SDC should be planning now to consider this now because full adoption of the plan by October of this year is unlikely, and plan pragmatically and positively for the uplift in the minimum housing requirement, through the allocation of additional sites. We discuss further whether the anticipated supply could react to this higher level of housing need in Matter 7.
- 1.17 It is our view that the housing requirement should be 652 dwellings per annum between 2020 – 2022, with the remainder of the plan period seeking to deliver a minimum of 671 dwellings

per year. This equates overall to a housing target of 13,382 dwellings, an overall uplift of 782 dwellings against the current target set out in the Local Plan of 12,600 homes.

- 1.18 By not planning for this figure, the authority fails to have positively prepared the plan in accordance with paragraph 35 of the NPPF. This will have significant consequences in respect to affordability and availability of housing for local people.

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?

- 1.19 As set out under question 2, the evidence we have reviewed does not suggest that the Council has considered the higher housing figure of 671 dwellings per annum produced by the newest standard method calculations. In our view, this should be planned for now rather than requiring an early review of the Plan which will cost further significant time and resources.

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?

- 1.20 We note paragraph 5.4 of the LHNA which states *'the Gloucester LPAs are awaiting a Gloucestershire Economic Needs Assessment, which will drill down in more detail than the Oxford and Cambridge econometrics data used in this LHNA. The Economic Needs Assessment may also have an impact on housing needs calculations and will need to be considered in updates to this LHNA'*.

- 1.21 The Economic Needs Assessment was then published in August 2020, however no further update to the LHNA appears to have been undertaken which discusses how this impacts upon the housing requirement. Neither Topic Paper EB7 (Employment) or EB8 (Housing Need) refer to how this assessment has been considered in terms of the housing requirement, with paragraph 1.5 of the paper stating *'the LHNA considers that there will be sufficient resident workers to align with the jobs growth forecast and no economic justification for increasing the LHN above the minimum figure identified by the standard methodology'*. We would therefore like the Council to clarify that this paper has been taken into consideration and this does not require the housing requirement to increase to align jobs and workers.

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?

1.22 This is our understanding of the figures, as set out below.

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?

1.23 As set out in paragraphs 2.5 – 2.7 of our representations to the Pre-Submission Plan Consultation (July 2021), the LHNA identifies that there is an overall unadjusted need for affordable housing of 424 dwellings per annum (8,480 homes over the plan period).

1.24 Paragraph 31 of Topic Paper EB8 (Housing Needs and Housing Supply) sets out that the strategic residential allocations will provide 2,424 affordable homes over the plan period – although this assumes full policy compliant levels of affordable housing is delivered on all sites which, given our viability concerns about Sharpness and Wisloe set out in our other matter statements, is not certain based on the available evidence and the needs for these sites to deliver significant amounts of unfunded infrastructure upfront.

1.25 Even if all sites do deliver full policy compliant levels of affordable housing this is less than 30% of the overall anticipated need for affordable housing (unadjusted figures).

1.26 In our view therefore, the authority should be considering planning for a higher level of housing need and allocating additional sites to aid in meeting affordable housing need.



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