

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.20 explains that there is an overall unadjusted need for affordable housing of 424 dwellings per annum, after taking into account committed supply. Paragraph 4.21 then goes on to acknowledge that *“affordability is expected to worsen over the next 20 years increasing the impetus for a greater supply of affordable housing within the district”*.

The Stroud District Housing Land Availability- Residential Commitment in Stroud District at 1st April 2020 explains that over the period 2016-2020 a total of 550 ‘affordable housing’ completions were recorded, which equates to 137 units per annum over the same monitoring period. This compares to an overall unadjusted need, referenced within CP9 of 446 dwellings per annum.

In this context it is appropriate for the Local Plan to maximise the delivery of affordable housing and within Core Policy 9 it is confirmed that sites capable of providing 10 or more dwellings, or covering a site area of 0.5 hectares, will be required to provide “at least 30% affordable housing”. Whilst there is no objection to the requirements of the policy, it is considered necessary that the policy wording should include greater flexibility to recognise that in some cases, due to robustly evidenced viability constraints, the achievement of 30% may not be possible. It is noted that within the preceding text to CP9 (paragraph 4.21) there is reference to circumstances such as unusually higher costs as a factor which may justify a level of affordable housing which is below the 30% requirement. However, such flexibility and recognition that such scenarios may occur should be referenced within the policy itself. In doing so, ensuring that there is policy mechanism which takes into account circumstances where viability issues, or the need to give priority to other Local Plan objectives, provide sufficient justification for a departure from the 30% requirement.

Given the acute need for affordable housing within the district, it is essential that opportunities to achieve affordable housing are maximised, specifically from those sites which are allocated for development. In this context, where a site is proposed to be allocated, the precise scale of development envisaged at such locations should not be artificially constrained by high level assessment of potential development capacity. Where it can be demonstrated that higher levels of development are possible at allocated sites, whilst continuing to satisfy both the vision for the locality and Guiding Principles, alongside wider objectives of the Plan, then it is evidently sensible and pragmatic for the Local Plan to facilitate such levels of development.

An example of this is the PS38 Kingswood allocation, where the policy states that the site is allocated for development comprising 50 dwellings. The current planning application for this application submitted by PHSV comprises a development of 58 dwellings, thereby providing opportunities for an increased level of affordable housing provision. Furthermore, we have explained in our comments on PS24 that this site has capacity to deliver 1,030 new homes whilst still satisfying the objectives and requirements of the policy basis for this allocation. This additional capacity, identified through site specific studies and surveys, provides greater opportunities to deliver additional affordable housing, which would otherwise not be available if the quantum of development proposed at PS24 is arbitrarily restricted to the 900 figure.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound.

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In response to the Draft Local Plan consultation PHSV recommended the additional wording to CP9:

*“The Council will negotiate the tenure, size and type of affordable housing units on a site by site basis, having regard to housing needs, site specifics and other factors. **If it is demonstrated that the site would be deliverable with a 30% affordable provision, a reduced provision will be acceptable providing it is supported by a robust viability assessment.**”*

This recommended change to CP9 has not been applied in the Pre-Submission version. Notwithstanding this, and for reasons explained previously, the inclusion of such additional wording is considered necessary to provide sufficient flexibility and robustness to CP9 without diluting its overarching objectives.

(Continue on a separate sheet /expand box if necessary)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Persimmon Homes Severn Valley (PHSV) is a national housebuilder and controls land identified within the Pre-Submission local Plan identified as proposed allocations, these being: 1) Land south of Wickwar Road, Kingswood (**PS38**), and 2) Cam North West (Land west of Draycott), working alongside Robert Hitchins Ltd (**PS24**). PHSV is therefore well placed to contribute to the Examination.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

21.07.21