

**EXAMINATION OF THE STROUD DISTRICT LOCAL  
PLAN REVIEW**

**INSPECTORS' MATTERS, ISSUES AND QUESTIONS**

**MATTER 7 Housing Provision:**

**Matter 7a Housing Supply**

**On behalf of: Robert Hitchins Ltd**

Date: February 2023 | Pegasus Ref: SHF/P17-2258

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## Document Management.

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 7a, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
  - Matter 7a
  - Matter 7b
  - Matter 7c
- Matter 8
- Matter 10
  - Matter 10a
  - Matter 10c
  - Matter 10d
- Matter 11
  - Matter 11a
  - Matter 11b
  - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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## 7. MATTER 7 – HOUSING PROVISION

- 7.1 Issue 7 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? Are the policies for housing development, including those to meet specific needs, sound?

### Matter 7a Housing supply

#### Overall supply

Table 2 of the Plan (page 33) summarises the housing land supply for the plan period. This includes commitments, allocations and a small sites allowance (windfall) which together form a total housing supply of 14,935 dwellings. Taking commitments of 4,595 dwellings off the housing requirement of 12,600 dwellings leaves a minimum residual housing requirement of at least 8,005 dwellings.

The Topic Paper EB8 confirms that the Housing Land Supply Assessment Update November 2020 (EB15) provides the latest evidenced schedule of large site progress and anticipated delivery from developers and site promoters for all major development sites.

1. As identified in Table 2 of the Plan, the site commitments are based on April 2020 data, except small sites which are based on April 2019.
  - a. Are more recent updates available listing all housing completions since the start of the plan period and commitments (sites with planning permission)?
    - 1.1 This is for Stroud District Council to answer.
    - b. Can the Council explain why sites with resolutions to grant permission are included as 'firm commitments'? Are all these sites subject to the signing of section 106 agreements or are there other reasons for the delay in granting permission? What are the timescales for the decisions to be issued? Are such sites proposed to be within the five year supply from adoption of the Plan and if so, are they justified?
      - 1.2 This is for Stroud District Council to answer.
      - c. The table also includes undeliverable commitments of 620 dwellings. What are the reasons for these sites to be undeliverable and is their removal from the supply justified?
        - 1.3 This is for Stroud District Council to answer.
  2. Does the supply identify sufficient land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, in accordance with paragraph 69 of the Framework?
    - 2.1 This is for Stroud District Council to answer.
  3. Paragraph 74 of the Framework states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. No such trajectory appears to be in the Plan. Is there a particular reason for this? Also has consideration



been given as to 'whether it is appropriate to set out the anticipated rate of development for specific sites' within the Plan?

3.1 This is for Stroud District Council to answer.

**4. Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement?**

4.1 The total housing provision in the submitted Plan is 14,935 dwellings against a total requirement of 12,600 dwellings, giving a nominal 'buffer' of 2,235 dwellings (+18%). As the Council has not published an up-to-date trajectory which also takes into account recorded completions for the years 2020/21 and 2021/2, it is currently not possible to ascertain if the size of this buffer still holds.

4.2 As set out in our Hearing Statement to MIQ Matter 5 we have significant concerns over ability of the proposed new settlement at Sharpness to deliver 2,400 dwellings in the plan period, Equally, doubt can be cast at the proposed trajectory for the proposed Wisloe New Settlement particularly as there is no developer involved. Even if an application were submitted in 2023 using the Lichfields' "Start to Finish," research the site is unlikely to start to deliver dwellings until mid -to-end of 2028 at the earliest.

**5. Is there credible evidence to support the expected delivery rates set out in the housing trajectory? The annual housing requirement of 630 dpa would be a significant rise in house building rates from recent and historic trends in the borough. Does the evidence support that this is achievable?**

5.1 Notwithstanding concerns over the appropriateness of specific allocations to meet the housing requirement, we agree that 630 dpa is an achievable rate of house building as evidenced by completion rates in recent years (666 in 2019/20, 776 in 2020/21 and 771 in 2021/22), some of which occurred during the lockdown due to the pandemic.

**6. Does the allowance for windfall sites accord with paragraph 71 of the Framework?**

6.1 The small site windfall allowance is 75 dpa equating to 1,275 dwellings over the Plan period. However, this figure is based on an assessment of delivery on small sites for the 11-year period 2005/6 to 2015/16 and does not include evidence for the last six years. Unfortunately, the Council's Annual Housing Availability Reports do not present detailed information on completions and therefore it has not been possible to calculate what the effect of considering the last six years would have on the windfall allowance.

**Five year housing land supply**

Within the Housing Needs and Supply Topic Paper (EB8) at Table 7, the Council suggests they are able to demonstrate a 6.57 year housing land supply. This is for the period 1 April 2020 to 31 March 2025 and is based on a minimum annual housing requirement of 630 dpa.

7. Although paragraph 68 of the Framework seeks that planning policies identify a supply of deliverable sites for 'years one to five of the plan period', the PPG advises that 'strategic policies should identify a 5 year housing land supply from the intended date of adoption of the plan'. No practical purpose is served by assessing five year supply from an earlier date.

- a. **Can the Council produce a five year supply calculation looking forward five years from around the intended date of adoption of the plan? Is it based on robust evidence and is it justified?**
- b. **Are any adjustments necessary to take account of any shortfall or over-supply since the Plan's base date?**

- 7.1 Table 7 of EB8 shows the Council's housing land supply position at April 2020 based on the current adopted Plan and therefore excludes any contribution from new allocations in the submitted Plan. We calculate the contribution of those sites within the period 2020 to 2025 from the Council's trajectory as submitted with the Plan to be 350. Accordingly, once these sites are included within the supply the five year housing land supply at April would be 7.10 years.
- 7.2 Looking forward to the potential point of adoption at April 2024, the theoretical five year supply based on the submitted trajectory is likely to have improved to 7.56 years, before any oversupply is accounted for.

	April 2023	April 2024
5 year LHN (630 dpa) +5%	3,308	3,308
Total Supply	5,064	5,004
Years Supply at Base Date	7.66	7.56

- 7.2 Applying the revised 2022 LHN as calculated using the Standard Method then there would be a five-year supply of 71.0 years at April 2024.

	April 2023	April 2024
5 year LHN (671 dpa) +5%	3,523	3,523
Total Supply	5,064	5,004
Years Supply at Base Date	7.18	7.10

- 7.3 It currently falls to a matter of planning judgement as to whether oversupply should be accounted for in the calculation of five year supply based on the adopted Plan requirement. However, given the likely five year position at adoption of the Plan, for the practical purposes of meeting the provisions of the PPG it makes no difference.

8. **As identified in the Council's Five Year Housing Land Supply document (2020) (EB14), a non-implementation rate of 22% is applied to small sites with planning permission. This appears to be based on recommendations in a 2013 report which reviewed the Council's land supply. Is there more up to date evidence to confirm why such a high rate is**



**justified? Is this approach proposed for this plan period and if so, does it accord with the definition of 'deliverable' within the Framework? Overall, is the approach justified?**

8.1 This is for Stroud District Council to answer.



**Town & Country Planning Act 1990 (as amended)**  
**Planning and Compulsory Purchase Act 2004**

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