

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

Hearing Statement on Behalf of Vistry Group

Matter 7: Housing Provision

**Respondent Ref: 912**

**February 2023**

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1. The following Hearing Statement has been prepared on behalf of Vistry Group in relation to Inspector's Matter 7a: Housing Supply, Matter 7c: Other housing policies. This Statement addresses questions raised by the Inspector of relevance to previous representations made by BBA Architects and Planners on behalf of Vistry Group, and should be read in conjunction with those representations.
2. This statement covers the Inspectors Issue 7, and questions 4, 5, 6, 7, 8, 18.

**Q4. 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?**

**Q5. 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?**

3. The Council's proposed Strategy of focusing housing on a small number of large sites will not provide sufficient flexibility to ensure the housing requirement is delivered. 89% of dwelling allocations are proposed on strategic sites. 43% of housing allocated are expected to be delivered from two new settlements.
4. Clearly if there are issues with any of these sites and any delays in them coming forward this risks the housing requirement being met in the plan period. The focus on a handful of larger allocations to deliver within the plan period puts at risk the housing requirement being achieved. Larger development sites generally take longer to come forward and there is more risk to their delivery. There is also often little incentive for large scale developments to deliver quickly as they would be effectively competing with themselves in terms of the houses they complete and which are on the market. Housing delivery is maximised by a range of housing site sizes and market locations. A wider mix provides choice for housebuyers and importantly ensures that there is competition which not only incentivises the faster delivery of housing but also would ensure that the price of new housing stays competitive.
5. Table 6 on page 306 of the Draft Local Plan show the following delivery from a selection of the larger sites between 2025 and 2030:

	<b>Projected Delivery 2025 - 2030</b>	<b>Projected Delivery 2030-2035</b>
Cam North East Extension	50	130
Cam North West	700	
Sharpness Docks	112	78
Sharpness New Settlement	500	750
Wisloe New Settlement	565	660
<b>TOTAL</b>	<b>1,927</b>	<b>1,618</b>

6. The above shows that it is expected that these 5 sites will provide 1,927 houses in a five year period between 2025 and 2030. This equates to approximately 385 dwellings a year. However, all of these sites are within approximately 4 miles of each other and will effectively be competing with each other. Market factors are therefore likely to influence delivery and slow completions with so many houses being proposed in one small area. Also land assembly, viability and technical barriers to delivery, as well as delays within the planning process, have a significant impact on the timescale for delivery of large strategic sites, which has not been duly accounted for within the trajectory. The anticipated delivery from these sites is therefore far from certain.
7. A mix of the size, type and location of housing allocation offers the opportunity to spread developments sustainably amongst existing sustainable locations around the district and support existing communities rather than focusing on the creation of new communities. Smaller and medium scale sites generally complete at a faster rate than large scale sites and have shorter lead in times due to them not having a heavy infrastructure burden. A variation in locations also encourages sites to be delivered quicker with different sites catering for different markets.
8. The Wotton Cluster only has a single 50 dwelling allocation, but has capacity to provide substantially more in a sustainable way which will balance the provision of employment (and new employment allocations) in this locality. The reallocation of more dwellings in this locality would more appropriately spread development across the district and make the delivery of the Housing Requirement more likely and the delivery of housing more robust.
9. The village of Kingswood is very well-strategically located, being in close proximity to Junction 14 of the M5 and the train station at Charfield (planned for re-opening), and integral to the planned Sustrans traffic-free segregated strategic cycle route connecting Wotton, Charfield and Kingswood (the 'WCK Greenway') to local employment opportunities, education, leisure and retail facilities. The village of Kingswood itself is also well served with community infrastructure including a primary school, shop, pub, village hall, post office and recreation facilities and is therefore able to accommodate further strategic growth sustainably.

**Q6. Does the allowance for windfall sites accord with paragraph 71 of the Framework?**

10. The Council have set out a small site allowance of 75 dwellings per annum. In accordance with Paragraph 71 of the NPPF, a windfall allowance such as this should be supported by compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.
11. The Council's evidence for consistent delivery of windfall sites is contained at appendix 8 of the Stroud District Five year Housing Land Supply 2020 document (eb14). This provides an

outline of delivery of windfall sites on a yearly basis between 2005 to the beginning of 2016. The table shows a big fluctuation of delivery between years, ranging from just 40 up to 112 dwellings. However the main issue is that there is no data on delivery from Windfalls since 2016. The evidence provided is therefore not sufficient in demonstrating a reliable source of supply from Windfall sites.

**Q7. 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?**

12. Vistry reserve the right to comment on submissions made by the Council in relation to Question 7 at the hearing if necessary.

**Q8. 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?**

13. Vistry reserve the right to comment on Q8 at the hearing, if necessary, following the Council's response.

**Sustainable Rural Communities – Delivery Policy DHC2**

**Q.18 This policy supports schemes of up to 9 dwellings outside SDL at Tiers 3b and 4 settlements, subject to meeting five criteria. We've already asked some questions under Matter 2 that are relevant to this policy which may be duplicated here.**

**a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this?**

14. Policy DHC2 states that small housing schemes of up to 9 dwellings will be supported outside development limits at designated Tier 3b and Tier 4 settlements. Whilst this would provide opportunity to address housing provision in these less sustainable settlements, there is no

justification why this is limited to Tier 3 and 4 settlements, rather than more sustainable settlements such as Tier 3a settlements.

15. Core Policy CP3 provides scope (exceptionally) for development adjacent to settlement boundaries for tier 2 and tier 3a settlements. What is envisaged by “exceptional” development is not defined in the policy, but supporting diagrams on pages 56 and 57 suggest adjoining settlement development would be limited to 100% affordable housing, single plots and live work development. As defined more sustainable settlements, there is no logical reason why Tier 2 and 3a settlements should have more restrictions than Tier 3b and 4 settlements in relation to development adjoining settlement boundaries.
16. There is no justification for Policy DHC2 to be limited to Tier 3b and Tier 4 settlements, nor the arbitrary limit of 9 dwellings.
  - c. **Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? What if the identified need was higher?**
17. The 9 dwellings cap on development size (and the requirement for development to not lead to a cumulative increase for more than 10% of the settlement housing stock) provides an arbitrary limit where larger schemes could be more appropriate to help the sustainability of that settlement or the wider community. This is preventing comprehensively planned sustainable development from coming forward. Also this is not limited to a single development of 9 homes, and therefore there may be multiple small developments within small villages, leading to an unsustainable development pattern, unsupported by infrastructure, and critically, not securing any delivery of affordable housing.
18. There is no justification for Policy DHC2 to be limited to Tier 3b and Tier 4 settlements, nor the arbitrary limit of 9 dwellings.