



1. The purpose of this Paper is to set out Avant Homes's (Avant) position in respect of Matter 7

Question 3

2. Avant's position is that the lack of a housing trajectory regarding the delivery of the strategic sites in the Plan is unhelpful and contrary to the guidance in the NPPF.
3. The starting point for housing policy in the NPPF is paragraph 60, which sets out the Government's overall approach to housing. This is focused on significantly boosting the supply of housing and ensuring that a sufficient amount and variety of housing sites come forward.
4. In Stroud's case, it has selected a development strategy which seeks to deliver the bulk of its housing requirement via eight strategic level allocations across the District. Avant has reservations about the heavy reliance the Plan places on these 8 strategic sites to deliver in a timely manner to meet the requirements of Paragraph 60. It thinks that a more dispersed strategy should be adopted and the lack of a housing trajectory for strategic housing sites in the Plan underlines its point.
5. In deciding to adopt a strategy which places the majority of its housing requirement in a very limited number of sites, the Plan will have had to meet the tests in paragraph 68 of the NPPF, which requires inter alia a clear understanding of land availability in the area and the deliverability of sites within years one to five of the plan period as well as specific sites for years six to ten. The output of this paragraph is that it requires the Plan to have a detailed understanding of the allocations which it is making and how they are going to be delivered.
6. Moving onto paragraph 74, this represents the culmination of the guidance in paragraph 60 and 68 in particular. The Council has to provide as a minimum, a detailed picture of its five-year housing land supply. It follows that the decisions it made to allocate specific sites in response to paragraph 68 should now manifest themselves into the housing land supply trajectory.
7. Submissions at the Regulation 19 Stage of the Plan on Avant's behalf have highlighted a number of concerns about the strategic allocations in the Plan because of the vulnerability



to developing serious housing land supply problems if these sites fail to deliver as anticipated. In addition, other submissions have raised serious concerns about the ability of these strategic sites to deliver in the timeframes set out in Table 6 of the Plan, further undermining the robustness of the Council's housing land supply position.

8. Therefore, either the Council is able to demonstrate a robust trajectory or not and that there is no justification for not providing a trajectory in the Plan. If the imposition of a trajectory highlights a supply issue, then this can be addressed by increasing the number of units to be delivered from making additional allocations.

Question 4

9. Avant's position is that there is no flexibility in the limited information in the housing trajectory to ensure that the housing land supply will be maintained.
10. The first problem is that the Council has not published a detailed trajectory in the Plan for the proposed allocations, as required by Paragraph 74 of the Framework.
11. The second problem is that the Plan is highly restrictive, looking to limit development to allocated sites and sites within settlement boundaries. Given that the settlement boundaries are drafted broadly commensurate with the urban areas of settlements, it means that the options for bringing other sites forward without conflicting with the Local Plan are seriously compromised. This means that easy to deliver sites in sustainable locations such as Avant's land at Dursley are overlooked.
12. The third problem is simply one of quantum of development. Taking Table 3 of the Plan, the problem is obvious:
 - Out of a total allocation of 9,065 dwellings.
 - 8,080 dwellings are accounted for in 8 strategic allocations (89%).
 - 985 dwellings are accounted for in local allocations/smaller sites (11%).
13. Based on an annual housing requirement of 630 dpa, the smaller, more rapidly deliverable allocations represent only 1.5 years of housing land supply should there be any failure in the timely delivery of the strategic sites. Looking at the trajectory on page 302, the Plan anticipates the small sites coming forward broadly uniformly across the Plan period,

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further limiting their potential to 'shore up' housing land supply across the Plan period. This leaves the Plan in the unenviable position of either:

- Phasing the delivery of small sites to prevent 'burn through' of smaller easily deliverable allocations

or

- Facing 'burn through' on the smaller allocations in the early years of the Plan.

14. In either case, this could lead to housing land supply problems, where the Council's housing land supply calculation is reliant on the strategic sites, which account for 89% of its housing target. This further underlines the need for greater flexibility and a greater number of non-strategic housing sites to come forward in the Plan.

Question 5

15. Avant is of the view that there is not the evidence to support the expected delivery rates set out in the housing trajectory, because of the lack of evidence on the delivery of strategic housing sites. This means that the Plan is failing to meet the requirements of the NPPF.

16. In terms of what evidence is available, past annual build rate data can be extrapolated from EiP Document EB12. Page 15 of the document shows that between April 2006 and March 2021 (15 years) 7091 dwellings were completed, equating to 472 dpa, a shortfall of 158 dwellings. This is a simplistic assessment of historic build rates and greater clarity could be achieved if the Council provided the data in an appropriate format. A good example of this would be the Table provided in Annex 1 of EiP Document EB15, showing the historic annual completion rates across the period 2006 to 2021. Aside from presenting a better understanding of the annual completion rate year on year, the data would also demonstrate the completion rates from Strategic Sites allocated in earlier Local Plans (e.g., Hunts Grove or West of Stonehouse) so that a more detailed conclusion can be drawn about delivery rates from strategic sites allocated in the plan.

Question 6

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17. In respect of the windfall allowance, Avant is concerned that there is not the evidence in the Plan to support the allowance proposed.
18. The first issue is the quantum of development. Currently, the Plan anticipates a windfall delivery of 1275 dwellings across the Plan period, equating to circa 63 dwellings per annum. Currently, the windfall assumptions made in the Plan equates to 129% of the small sites' allocation figure.
19. The second issue is how the windfall figure is calculated with reference to the requirements of Paragraph 71 of the NPPF. Avant does not dispute the need for a windfall allowance in the Plan, but the NPPF requires that the allowance has to be "realistic" and have regard to the SHLAA, historic rates and future trends. It is noted that Document EB14 provides windfall data in Appendix 8, but this does not list the types of sites which are classifying as windfall.
20. Turning to the matter of the SHLAA, there is a considerable evidence base of sites in the Plan which can come forward and in conjunction with other Regulation 19 representations by Avant it is felt that opportunities have been missed to allocate additional sites to reduce the reliance on windfall. There is nothing in the NPPF preventing the Plan from allocating additional sites to further reduce its reliance on windfall housing sites.
21. The third issue relates to the lack of data available from the Council. As with the response to Question 5, the data is available to the Council for it to present and it is an opportunity missed. Again, referring to Document EB15, it should be possible for the Council to provide such data, based on previous monitoring results.

Question 7

22. Currently, Avant remain unconvinced about the 5-year housing land supply calculation moving forward from the proposed adoption date of the Local Plan. Assuming a Plan adoption in 2024, we do not have a detailed estimate of completion data from the allocations in the emerging Plan. In conjunction with other submissions, the problems associated with strategic site delivery are made clear. According to the analysis on Page 302 of the Plan, the following supply picture is presented:

- 626 from strategic sites for years 2020 to 2025.

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- 3077 from strategic sites for years 2025 to 2030.
23. This places a total of 3,703 dwellings to be provided at some point prior to 2030, some 6 years after the anticipated adoption date of the plan (2024). This equates to 617 per year over an eight-year period. It is not clear how this supply is assumed to be delivered through the plan period to 2030. Other EIP documents provide a picture of how the current Local Plan allocations are to be delivered, but there is not that integration of new sites into the process.
24. The significance of this risk can be demonstrated with EIP Document EB14. Appendix 9 of this document shows that from monitoring year 2025/26 completions will drop from
- 25/26 – 654 dwellings.
 - 26/27 – 506 dwellings.
 - 27/28 – 259 dwellings.
 - 28/29 – 255 dwellings.
 - 29/30 – 227 dwellings.
25. Over these five years, the housing total is 1,901, compared to a requirement of 3,150 over the same period, a shortfall of 1,249.
26. From a housing land supply standpoint, it is simply essential that the strategic sites deliver at the identified rates in the table on page 302 of the Plan. As has been demonstrated in our submissions, there is a considerable risk of this not being achieved. The alternative sources of supply, being local-level allocations, which should be able to be delivered easily within a 5-year timeframe do not address this shortfall.
27. Therefore, in terms of the Plan’s housing land supply position, Avant is of the view that the Plan is unsound and that there is a need to allocate additional housing sites to make up for delivery difficulties likely to be experienced in the early years of the Plan.