

Planning Policy
Stroud District Council
Ebley Mill
Westward Road
Ebley
Stroud, GL5 4UB

4269 SDC LP Review consultation Dec 2020

16 December 2020

Dear Sir or Madam

Stroud District Local Plan Review – Additional Housing Options Consultation Representations on behalf of Vistry Group

I write on behalf of our client, Vistry Homes (Vistry), to provide representations to the Additional Housing Options consultation. These representations are made in relation to Vistry's interests in land at Wotton Road, Kingswood. Vistry made representations (prepared by Barton Wilmore) in relation to the site to the last consultation on the Draft Local Plan in January 2020.

This additional consultation, as a result of the Governments proposed changes to the standard method for calculating housing need, is welcomed and necessary. Whilst the impact of the changes to the standard method on the housing requirement of Stroud District Council are not as pronounced as for other local authorities, the changes would still result in considerable uplift of 148 homes per annum. It is therefore necessary to consider how these additional housing numbers can be sustainably delivered within the plan period. We note that the Government has indicated that further changes may be necessary to 'rebalance' growth.

The Additional Housing Options

The proposed change in the standard method would result in the Council having to significantly increase the annual delivery of housing and this will mean that a hybrid approach across the various options presented in the Additional Housing Options paper is likely to be required, but with a particular focus on option B (further allocations within Tier 2 and 3 settlements). A focus on option B offers the greatest potential of meeting the Council's housing requirement by spreading development across a number of sustainable allocations, thereby increasing opportunities for delivery and decreasing risk of undersupply.

There is likely to be limited potential to intensify existing sites within the draft plan (Option A). The most appropriate numbers and densities for sites should already have been considered, otherwise the proposed allocations would be unsound. Further intensifying sites would most likely have a harmful impact on the site, or the surrounding area,



potentially in terms of character; capacity of facilities and services; landscape; drainage; highways; heritage; and ecology. The number of dwellings that have already been proposed for these sites should have taken these constraints and capacity issues into account. Clearly the opportunities to increase output from these sites is going to be limited and therefore an approach based purely on Option A would not enable the Council to meet the increased delivery requirements. There will not be the capacity within these sites to deliver the additional housing required.

In addition, with a strategy based on Option A, the Council would be over reliant on a smaller number of sites to deliver the housing requirement, which would put delivery within the plan period at risk.

Option C (Additional Growth point) has a similar issue as with Option A in that the Council would be reliant on less sites to deliver the requirement, again putting at risk achieving the requirement within the plan period. The new growth points would have limited infrastructure and no existing services and facilities which would have to be established, again adding risk and delivery uncertainty and longer lead in times for development. With the need to allocate sites in the short to medium term to meet the housing requirement it will be necessary to consider how existing tier 2 and 3 settlements, with established facilities and services and existing links with other larger settlements could accommodate this growth.

Option D (wider dispersal) may be required, but clearly the Council should adopt the approach of looking at the most sustainable locations for development first (Tier 2 and Tier 3 settlements) before considering Tier 4 Settlements. In this way, Option D should be considered as a hybrid of Option B.

Therefore a focus on sites in in Tier 2 and Tier 3 settlements to deliver the additional housing required is the most sound approach.

In this regard, as has been highlighted previously by Barton Wilmore in their representations on behalf of Vistry, Kingswood represents an appropriate location in which to consider further housing development. As is highlighted in those representations, Kingswood is currently considered to be tier 3a but has sufficient shared facilities with Wotton-under-Edge to be considered tier 2. Housing at Kingswood would appropriately provide dwellings for the wider Wotton Cluster, particularly given that Wotton-under-Edge is located within the Area of Outstanding Natural Beauty which is a constraint to housing development there.

Reserve Sites

Vistry consider that reserve sites can provide valuable flexibility and contingency to assist the Council in delivering the housing requirement. However, detail of how and when reserve sites come forward is critical, and the criteria for designating a site a 'reserve' rather than an allocation is key in establishing whether it is a sound approach or not. Vistry therefore reserve the right to comment further on this if the Council consider taking reserve sites forward and more detail is provided.

In any case, if the reserve site option is taken forward, the Council's strategy for allocation of reserve sites should follow the same approach as set out above. The most sustainable sites, identified within this strategy should be allocated to meet the housing requirement, with additional sites, considered less sustainable, or with particular development issues meaning they cannot come forward immediately, allocated as reserve sites to account for any delays or non-delivery which would risk the housing requirement not being met.

Additional Housing Options – Potential Sites

Vistry have no specific comments on any of the new sites identified in the Additional Housing Options Paper. However, it is clear that these sites alone would not be sufficient to meet the additional need and more sites will need to be identified.

The previous representations submitted by Barton Wilmore on behalf of Vistry have already made comments about the suitability of Land at Wotton Road, Kingswood as a housing allocation and as such these will not be repeated here. However, in addition to this, a Vision Document for the site has now been prepared and is submitted with these representations to demonstrate how the site could sustainably deliver 100-120 dwellings.

I trust the above comments will be taken into account and we would be happy to provide further information to the Council on the proposed development of the site as further information becomes available. Moreover, should the Government's revised standard methodology vary from the previous draft we would welcome the opportunity to comment further.

Yours faithfully

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Planning Director