



# **Kingswood Parish Council Hearing Statement**

**Stroud Local Plan Examination**

**Matter 3 – Housing need and requirement**

**February 2023**

*This Hearing Statement is prepared and submitted on behalf of Kingswood Parish Council (KPC).*

***ISSUE 3 – Is the identified housing need supported by robust and credible evidence, justified and consistent with national policy? Is the Plan’s housing requirement of at least 12,600 dwellings justified and consistent with national policy? Is the Plan’s approach to addressing some unmet housing needs for Gloucester soundly based?***

### **Housing requirement**

The PPG advises that the standard method identifies a minimum annual housing need figure, but states that it ‘does not produce a housing requirement figure.’ The Plan, through Core Policy CP2, states that ‘Stroud District will accommodate at least 12,600 additional dwellings.....to meet the needs of the District for the period 2020-2040’. This is the same amount as the capped standard method figure for need set out in the Plan.

**Q16. To provide clarity for future decision-makers the Plan should clearly identify and distinguish between the objectively assessed housing need, the standard method figure, the housing requirement and the level of provision in the housing requirement to help meet the unmet needs of Gloucester City. Does the Plan do this?**

**KPC Response:**

1. Yes this clarity is required to make the policy effective and consistent with national policy.

**Q17. Paragraph 65 of the Framework states that ‘strategic policies should also set out a housing requirement for designated neighbourhood areas...’. The Council’s evidence details that there are 17 neighbourhood areas within the District with 10 made Neighbourhood Plans (NP). The Council’s Topic Paper on Neighbourhood Planning (EB5) explains that as no made or emerging NP allocate housing sites, housing requirements are to be set through site allocations in the Plan currently under our examination.**

- a. Is this approach consistent with national policy, particularly with regard to paragraphs 65-67 of the Framework?
- b. Is it clear which sites are within each defined neighbourhood area and what the proposed housing requirements in these areas would be?
- c. What are the implications of these proposed housing allocations on the designated neighbourhood areas and any emerging or made NP?

**KPC Response:**

2. The NPPF is very clear at Paragraph 66 that the Local Plan should establish an overall “housing requirement figure for their whole area” and that *“Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement”*.
3. The NPPF states at Paragraph 67 that *“Where it is not possible to provide a requirement figure for a neighbourhood area<sup>33</sup>, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”*

Footnote 33 states: *“Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after strategic policies have been adopted; or in instances where strategic policies for housing are out of date.”*

4. SDC states in its Neighbourhood Planning Topic Paper<sup>1</sup> that no made or emerging Neighbourhood Plan area have chosen to allocate housing sites in their designated areas and it is on that basis that SDC has not set housing requirement numbers for the designated areas and made the allocations itself in the Local Plan.
5. **Housing Requirement:** SDC has misunderstood the NPPF which requires a housing requirement figure for designated neighbourhood areas. This figure needs to be set out in the Local Plan for testing so that it not required to be tested when the Neighbourhood Plan is updated. The NPPF is clear about the instances where it would not be possible for an LPA to provide a requirement figure for a neighbourhood area which is when a neighbourhood area is designated at a late stage in the strategic policy-making process or after strategic policies have been adopted or where strategic policies for housing are out of date. None of these instances apply to Kingswood therefore a housing requirement figure should have / should be required.
6. **Site Allocations:** Whilst SDC explains that no Neighbourhood Plans have chosen allocate housing sites for their designated areas, if SDC had followed the NPPF

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<sup>1</sup> EB5 – Neighbourhood Planning Topic Paper – Paragraph 3.2

correctly it would have first set the housing requirement figure for the Neighbourhood Areas and then the next step would be to determine who will make the allocations whether that be only SDC, only the Qualifying Body or a combination of the two. Besides the fact that no housing requirement figure was provided to the Qualifying Bodies there was no discussion with Kingswood Parish Council, for example, about what the housing requirement figure would be, and which plan would allocate sites to meet the need.

7. Since 2005 SDC has allocated housing in Kingswood to support the Wotton Cluster with no housing being allocated at the Tier 2 settlement Wotton under Edge and as a result Kingswood has taken a significant amount of development for a small parish with very little infrastructure.
8. KPC would welcome the opportunity to allocate sites through its NDP Review subject to the housing requirement being tested through the Local Plan Examination. KPC would welcome a discussion on this with SDC before or during the Hearings if this would be acceptable to the Inspectors.
9. KPC is aware that its NDP may need to be reviewed and updated following adoption of the SDC Local Plan. KPC has this as an agreed Parish Council objective and have budgeted to ensure that the review of the NDP can take place as soon as practicable following Local Plan adoption.

**END.**