

## MATTER 7a: HOUSING SUPPLY

1. This Hearing Statement has been prepared on behalf of Slimbridge Parish Council (SPC), who have submitted extensive representations in relation to the proposed Wisloe new settlement (hereafter referred to as “PS37”).

***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?***

### 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.

Q.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)?
2. Slimbridge Parish Council (SPC) consider that it is vital that fully up-to-date data is published in respect of both housing completions and commitments since the beginning of the Plan period.
  3. It is of fundamental importance that the Draft Local Plan is based upon a clear understanding of the precise level of housing provision that has already been completed and what further sites have so far been granted planning permission and are already in the housing pipeline for the district.
  4. We note that the latest Housing Delivery Test Measurement identified that in the three-year period between 2018-19 and 2020-21 a total of 1,247 dwellings were required to be delivered in the district. Whereas the total number of homes that were actually delivered

was 2,008 dwellings. Consequently, Stroud had a Housing Delivery Test measurement score of 161%.

5. This demonstrates that in recent years Stroud has been delivering significantly more housing annually than its actual housing requirement figure. Clearly, it is of fundamental importance that this over-provision in housing delivery is fully taken account of when considering the range of site allocations needed to deliver the district's housing requirement.
6. This fact is further demonstrated by the Council's '[Stroud District Housing Land Availability: Residential Commitment in Stroud District at 1<sup>st</sup> April 2022](#)' document.
7. Table 1 illustrates the net completions, for the adopted Local Plan period since 2006, and commitments for Stroud District set against the adopted Local Plan 2015 housing target. It identifies that between 1 April 2006 and 31 March 2022, Stroud has had 7,862 dwelling completions and total commitments of 3,634. Accordingly, housing delivery in Stroud has already exceeded the minimum Adopted Local Plan requirement for the period 1 April 2006 to 31 March 2031 by 96 dwellings given that 11,496 dwellings have already been delivered against the minimum target figure of 11,400 dwellings. This being achieved despite the fact that the Plan period still had a further 9 years to run, before it expires.
8. Table 2 updates net completions, for the Submitted Draft Plan period since 2020, and commitments at April 2022 set against the submitted Draft Plan minimum housing requirement calculated using the standard method. It identifies that as of 1 April 2022, Stroud had had 1,516 dwelling completions and total commitments of 3,634 dwellings. Consequently, Stroud District could identify a combined total completions and commitments figure of 5,150 dwellings. Accordingly, with a total housing requirement figure for Stroud of 12,600 dwellings between 2020-2040 under the standard methodology (630 dpa x 20 years), the Council has identified a remaining minimum requirement figure of 7,450 dwellings.
9. Both tables are based on large and small site commitments with planning permission or with a resolution to grant planning permission and do not include adopted Local Plan allocations or submitted Draft Plan allocations without planning permission.
10. Given the above, it is evident that Stroud's minimum housing requirement figure of 7,450 dwellings is now significantly less than the minimum residual housing requirement of at least 8,005 dwellings that the Inspectors have referred to.

11. Furthermore, it is important to note that by the time the Housing Supply Hearing Session takes place on 17 May 2023, a further monitoring year will have almost elapsed. We note that within the '[Stroud District Five Year Housing Land Supply \(December 2022\)](#)' document, Appendix 11: Draft Local Plan Housing Trajectory 2020-2040 identifies the anticipated delivery of approximately another 800 dwellings for the current monitoring year (2022/23), which is significantly higher than the 630 dpa figure identified under the standard methodology.
12. Accordingly, it is, therefore, highly likely that Stroud's current minimum housing requirement figure of 7,450 dwellings, will very shortly fall to around 6,650 dwellings. This figure is substantially below the 8,005 dwellings figure referred to in the Submission Draft Local Plan.
13. In paragraph 4.8 of SPC's Regulation 19 representations **[CD5d 953]**, we pointed out that it was evident that the identified level of housing supply of 10,340 dwellings as set out in Table 6 of the Draft Plan, represented a 29% over-supply in relation to the minimum residual housing requirement of 8,005 dwellings.
14. If, as we believe, the District Council's minimum housing requirement is only in the proximity of 6,650 dwellings in total, that would mean that the Authority's Local Plan will now be resulting in a huge over-supply against its level of actual housing need.
15. We have seen no evidence to justify such a variation to Stroud's actual required level of housing delivery. As a result, we consider that there is a complete lack of any justification for the provision of PS37 within the Draft Local Plan. In our hearing statement in respect of Matter 5 we provide more detailed reasoning as to why we consider that PS37 needs to be deleted from the Plan in order for it to be found sound.
- 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?**
16. We note that within Appendix 6 of the 'Stroud District Five Year Housing Land Supply (December 2022)' document identifies Sites with a Resolution to Grant Planning Permission, including Sites Subject to a S.106 Agreement.
17. However, only one site for 42 dwellings appears to be included within this particular category, that being Land south of railway line, Box Road, Cam.

**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?**

18. It is crucial that the District Council provides clear evidence to demonstrate why any particular commitments might be undeliverable.
19. There appears to be a complete lack of explanation as to why 620 dwellings would be undeliverable commitments.

**Q.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?**

20. The District Council is best able to respond to whether the Draft Plan does include 10% or greater provision of sites no larger than one hectare in size.
21. However, we do consider that it is very important that the housing land supply does indeed incorporate provision of at least 10% of all sites within the Plan that are one hectare or less in size. By ensuring that sufficient smaller and medium sized sites are allocated in the Plan, the District Council will be much more likely to be capable of maintaining a rolling five-year housing land supply, rather than if it were unduly dependent on very large sites for future housing delivery.

**Q.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?**

22. We note that Appendix 9: Deliverability of Sites within '[Stroud District Five Year Housing Land Supply \(December 2022\)](#)' document sets out anticipated delivery rates of individual sites between 2022/23 and 2036/37. It is not evident why the final 3 years of the Plan period are missing. Nor is it apparent what the 'Not Likely to be Built' category is intended to represent, given that it includes several hundred dwelling within it.
23. However, Appendix 11 within the same document does identify a Draft Local Plan Housing Trajectory covering the period 2020-2040.
24. It would be helpful if this were included in the Draft Plan (with any necessary updates).

**Q.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?**

- 25.** We consider that in order to ensure that there is sufficient flexibility in the housing trajectory to enable the housing land supply within the Plan area to be maintained, there is a need to ensure that sufficient smaller and medium sized sites are allocated in the Plan.
- 26.** It is a well-established fact, as demonstrated from such evidence as Lichfields' Start to Finish Update report<sup>1</sup>, that smaller and medium sized development schemes are usually much more able to be delivered quicker than much larger sites. This is particularly true with regard to new settlements, which by their very nature will be far more complex and time-consuming to deliver.
- 27.** The District Council needs to avoid an over-reliance on very large site allocations if it is to maintain a healthy and continuous supply of housing sites over the whole duration of the Plan period.
- 28.** Furthermore, we consider that a crucial deficiency of the Draft Local Plan is that it fails to take account of the contribution that Neighbourhood Plans could make towards meeting the District's housing land supply. Instead, it appears to have pre-determined upon a planning strategy that included the provision of new settlements, despite there being a distinct lack of any clear evidence available to demonstrate that they are actually required or represent an effective strategy for achieving sustainable growth across the District.

**Q.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?**

- 29.** The most recent Housing Delivery Test results identify that in 2019-20 there were 666 dwellings delivered in Stroud District. Whereas, in 2020-21, there were 776 dwellings completed. Consequently, delivery has been considerably in excess of the 456 dwellings per annum (dpa) housing requirement figure contained in the Adopted Stroud District Local Plan (November 2015).
- 30.** Whilst it is evident that in recent times housing delivery in Stroud has been strong, we are concerned that this might no longer be the case in the future if the Council becomes reliant upon a strategy that places undue expectations upon housing delivery emanating from new settlements. In particular, we believe that PS37 cannot be relied upon to deliver 1,500 dwellings within the Plan period given the complexities associated with the need to relocate the gas pipeline running through the length of the site, potentially undertake mineral extraction and deliver complex transport infrastructure improvements prior to the

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<sup>1</sup> See Appendix 20 of Slimbridge Parish Council's Regulation 19 Representations

construction of any new housing. The associated time delays and costs are likely to be very significant.

31. We consider that PS37 would fail to represent sustainable development and completely lacks merit as a proposed allocation in the Draft Local Plan. Particularly given that the available evidence points to the fact that it is simply not required.

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

32. Paragraph 71 of the NPPF requires that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
33. We note that within the 'Stroud District Five Year Housing Land Supply (December 2022)' document, Appendix 8: Historic Small Sites Windfall Delivery identifies that between 2005/06 and 2015/16 there was an annual average windfall delivery rate of 75 dpa.
34. It would be helpful if the District Council also incorporated windfall delivery data in respect of more recent years since 2015/16. However, other than that, we have no other reason to question the Council's allowance of 75 dpa.
35. However, we do consider that further thought ought to be given to the inclusion of other categories of windfall development based upon additional categories such as large windfall sites, conversions to residential uses, rural settlement sites etc.. Any such allowances would need to be based upon average past delivery rates achieved in Stroud District in respect of each of these particular windfall categories.
36. Furthermore, we observe that paragraph 1.12 of the 'Stroud District Five Year Housing Land Supply (December 2022)' document refers to the fact that in addition to the above housing land supply, the Council has identified further deliverable and developable housing sites within settlements, through the Strategic Assessment of Land Availability (SALA) 2017 and subsequent updates. It highlights that the Stroud District Brownfield Land Register includes other sites, on previously developed land currently without planning permission, that the Council has assessed as suitable for residential development which may also be forthcoming to further boost housing supply. Additional sites identified through these sources do not form part of the housing land supply calculation but will further enhance a healthy headroom of housing land supply above required levels and provide additional market flexibility.

37. Furthermore, it is evident from Tables 4A-D (Actual and Potential Loss of B-Use Employment Land) that significant amounts of brownfield housing provision have been, and are likely to continue to, come forward from current and former employment sites. The District Council's development strategy must seek to maximise brownfield development opportunities in order to reduce the need for development needing to occur on greenfield sites.
38. In December 2022, the [Stroud Brownfield Register](#) was published. We have calculated that this identifies site capacity for a net total of between 1,651 and 1,863 dwellings.
39. In our opinion, the District Council's identified housing supply needs to have proper regard to the content of its Brownfield Sites Register in terms of ensuring that this important component of the future supply is suitably accounted for.

#### **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.**

**Q.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?**
40. We note that Section 3. Housing Land Supply Assessment within 'Stroud District Five Year Housing Land Supply (December 2022)' document covers the period from 1 April 2022 to 31 March 2027, which identifies a supply of 5.34 years.
41. The Council's aforementioned figure is based upon a total supply of 3,760 dwellings. This is the figure it has arrived at after removing 1,320 dwellings from the initial housing supply figure of 5,080 dwellings. The stated justification for their removal is stated as being that these dwellings (as listed in Appendix 8) are unlikely to be built between 2022-27.
42. SPC is of the opinion that further careful scrutiny is required in order to see if the removal of such a high proportion of development from the identified five year housing land supply is actually warranted.

**b. Are any adjustments necessary to take account of any shortfall or over-supply since the Plan's base date?**

43. It is evident from Table 2 in the Council's 'Stroud District Housing Land Availability: Residential Commitment in Stroud District at 1st April 2022' document that there were 745 completions between 1 April 2020 and 31 March 2021 and that there were a further 771 completions between 1 April 2021 and 31 March 2022.
44. Consequently, the total of 1,516 completions over the first two years of the Plan's base date show that against a requirement for 1,260 dwellings (630 dpa x 2), there was an over-supply of 256 dwellings (1,516 – 1,260). This over-supply needs to be taken fully on board when considering whether there is any justification for the allocation of PS37.

**Q.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?**

45. SPC consider that it is totally inappropriate to apply a non-implementation rate of 22% to small sites with planning permission given that paragraph 1.14 of the 'Stroud District Five Year Housing Land Supply (December 2022)' document, specifies that the precise basis for the non-implementation rate of 22% that has been applied to small sites with planning permission, is based upon analysis carried out for the District Council by consultants Evans Jones during the preparation of their 2013 report "A Review of Stroud District Council's Five-Year Housing Land Supply (October 2013).
46. We strongly agree that it would be totally inappropriate for the District Council to apply a 22% discount to the identified supply based entirely upon a report that is now 10 years out of date and can no longer be in any way applicable. In the past, many local authorities commonly applied a 10% non-implementation allowance. However, even a lower discount at this rate should, in our opinion, still be backed up by actual past housing delivery evidence to demonstrate that it is actually warranted.
47. If any small sites non-implementation rate is to be applied by the District Council, it must be founded upon solid and up-to-date evidence.