

# Stroud Local Plan

## Examination in Public

### **Matter 3** – Housing need and requirement

Hearing Statement by Savills on behalf of L&Q Estates

February 2023



**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?**

### Gloucester’s unmet housing need

**3.6 The Plan states that the 2017 adopted JCS recognises that ‘Gloucester City has a good supply of land for the short to medium term that will enable it to meet its requirements to at least 2028/9’. National policy states that local plan policies are required to be reviewed within five years of adoption of a plan. In this context, and if the level of any unmet housing need is uncertain at this stage, why does the Council consider it necessary to allocate/safeguard land that may or may not be required?**

- a. Whilst the JCS claimed otherwise, it has since transpired that Gloucester City never had a good supply of deliverable land for housing in the period to 2028/29.
- b. The latest assessment of housing land supply in Gloucester City is the ‘Five Year Housing Land Supply Statement’ (May 2021). Table 1 of the Statement (reproduced below) compares housing completions since 2011/12 against the JCS housing requirement of 718 dwellings per annum (dpa).

Year	JCS Requirement	Annual Completions	Delivery Against Requirement
2011/12	718	593	-125
2012/13	718	430	-288
2013/14	718	476	-242
2014/15	718	554	-164
2015/16	718	470	-248
2016/17	718	439	-279
2017/18	718	487	-231
2018/19	718	544	-174
2019/20	718	488	-230
2020/21	718	724	+6
<b>Total</b>	<b>7,180</b>	<b>5,205</b>	<b>-1,975</b>

- c. In the first ten years of the JCS plan period, there has been only one year – 2020/21 – when delivery exceeded the requirement and then by only 6 dwellings. Over the course of the period since the start of the JCS, housing undersupply has accumulated to the extent that delivery has fallen 1,975 dwellings short of the requirement, equating to 72.5% of the JCS requirement.
- d. The same Statement concludes that looking forward the Council can demonstrate a 5.1 year housing land supply. Given the unwarranted optimism of the past, we have some reservations over the realism of that projection.
- e. The evidence of Gloucester City Council demonstrates that even four years after its adoption, the JCS's confidence in short term housing delivery in Gloucester City has proven to be unfounded and that instead it has significantly under-delivered housing against the JCS requirement. The SLP should not therefore be based on the assumption that there is no short-medium term shortfall and that the housing needs of Gloucester could be met through a subsequent review.
- f. This conclusion is further reinforced by the history of recent plan-making and timescales for delivery. If land is not allocated in the SLP to meet a proportion of the need arising from Gloucester then there is a significant risk of further delay and under-delivery. The effect of this delay is outlined in the table below:

Event	Comments	Year
Adoption of the JCS Review	Assuming the JCS keeps to timetable – something which has not been the case to date.	2025
Adoption of the Stroud Local Plan Review	Assuming that work starts immediately on the review of the Local Plan after an adoption in early 2024. For the reasons explained below we consider that the 2029 date is optimistic.	2029
Detailed Planning Permission Granted	Outline planning application following the adoption of the local plan, followed by detailed reserved matters for the first phase of development.	2031
Start on Site	Allowing time for conditions to be discharged and site preparation works to be completed.	2032

- g. These timescales represent a best-case scenario in terms of housing delivery and, even then, if the ‘safeguarded’ land was removed and the decision deferred to the replacement plan, it would be circa nine years before the first homes on the site were delivered.
- h. In reality, despite the national policy requirement to review a local plan within five years, it is highly likely to take longer than this. Indeed, the current Stroud Local Plan was adopted in November 2015 and at the time of its preparation it was recognised that there may need to be an early review in order to plan for the growth needs of Gloucester. This is stated explicitly at paragraph 2.72 in the supporting text to Policy CP2:

*“If local planning authorities in the housing market area can demonstrate through their local plan process that there are unmet development and infrastructure needs that could be met more sustainably through provision in Stroud District, these will be considered, including through an early review of this Local Plan, commencing within five years from adoption or by December 2019, whichever is the sooner.”*

- i. The ‘unmet need’ clause was triggered by the JCS process and despite this commitment to an ‘early review’ it has still taken to March 2023, over seven years, for the replacement plan to reach the Examination stage and at the anticipated point of adoption this will be close to eight years. If that assumption was applied to the timetable above it would mean that delivery of the first new homes on the site would not take place until circa 2035.
- j. Past history demonstrates that the cross-boundary review approach is simply not working. The JCS Inspector made very positive comments regarding the potential of the land at Whaddon through the Examination process (see Appendix B of our Statement to Matter 2) but, understandably, it fell outside of her remit to recommend an allocation through Main Modifications. The only means of resolving the challenges faced by the lack of a strategic plan with a wider geography which includes Stroud is to allocate suitable land within Stroud through this plan.
- k. In response to the questions below we explain whether that should be in the form of an ‘allocation’ or the ‘safeguarding’ of land.

### **3.8 When will it be determined whether the site at Whaddon would be required and when it would be consistent with the ‘approved strategy’ of the JCS Review? Would this be at the**

**point of adoption of the JCS Review? Does the Plan clearly set this out and does this justify the need to allocate/safeguard this site now?**

- a. An alternative approach to safeguarding land, would be for SDC to make the decision now to allocate land (whether at Whaddon or elsewhere) as a contribution towards the housing needs of Gloucester.
- b. A key question then for the soundness of the Local Plan is whether the decision to allocate would be premature in advance of the proper testing of all options through the JCS review. We do not consider that it would be. The relevant Gloucestershire authorities have clearly undertaken the work necessary to establish that the housing requirement for Gloucester City cannot be met within the authority area. This is based upon a housing requirement derived from the Local Housing Needs Assessment and an understanding of the housing capacity within the administrative area based upon recent evidence<sup>1</sup> prepared to inform the Local Plan. Furthermore, the assessment of the alternative locations has been undertaken by LUC on behalf of the authorities and this forms part of the evidence base for the SLP<sup>2</sup>.
- c. There is therefore publicly available evidence demonstrating the need and suitability of the alternatives available to meet this need and as such, there is sufficient evidence available to come to the judgement that an allocation should be included now.
- d. Allocating the land now within the Stroud Local Plan would be simple, justified and avoid the delay in delivery that would occur if a replacement for the SLP was needed before the development could come forward.

**3.9 Overall, is the inclusion of land at Whaddon to meet the needs of Gloucester justified, effective and consistent with national policy?**

- a. Whilst we support the principle of allocating or safeguarding land to meet the needs of Gloucester, we consider that the land at Whaddon should instead be allocated for development to meet the needs of Stroud District as a replacement for the existing New Community at Sharpness and an alternative location be allocated or safeguarded in its place.

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<sup>1</sup> Gloucester City 'Housing Background Paper', September 2019 and the Gloucester City Strategic Assessment of Land Availability – both documents form part of the evidence base for the Gloucester City Plan.

<sup>2</sup> Core Document EB17

- b. It appears to be the case that the local authority earmarked Whaddon as the location to meet the needs of Gloucester before considering whether it should be allocated to address the needs of Stroud. Indeed, Paragraph 2.4.14 of the Assessment and Selection of Sites Topic Paper (EB9) explains the authority's view on whether Whaddon, stating that:

*“The Emerging Strategy Consultation Paper (p35) had highlighted that there was potential to review how the sites at Whaddon and south of Hardwicke might contribute instead to Stroud District's future needs, should other alternative sites be preferred and/or if they were no longer needed by Gloucester.”*

- c. The Emerging Strategic Consultation Paper (EB105) to which this paragraph refers formed one of the earlier consultations on the Local Plan back in November 2018. It incorporated a proposed spatial strategy in a similar form to that which is now in the SLP and included the allocation of two new communities at Wisloe and Sharpness<sup>3</sup>. There was no explanation or justification in the document why Whaddon and Hardwicke had been earmarked to meet the needs of Gloucester as opposed to those of Stroud. In so far as the growth of Gloucester is concerned, the Paper stated that:

*“An assessment of potential alternative sites to meet Gloucester's long term housing needs will be carried out during 2019. Possible sites to the south of Hardwicke and at Whaddon (within Stroud District) will form part of that assessment, together with other sites both within and on the edge of Gloucester but within neighbouring council areas. The site(s) that perform best will be identified in the respective council's future draft plan(s) for potential allocation.”*

- d. The 'assessment of potential alternative sites' was then commissioned by the Gloucestershire authorities and forms part of the SLP evidence base - 'The Assessment of Strategic Development Opportunities in Parts of Gloucestershire' (EB17a). This Assessment did not however confine itself to the assessing locations on the edge of Gloucester as the Emerging Strategic Consultation Paper had envisaged. Instead, the Assessment evaluated all the potential strategic development opportunities on land from the southern edge of Gloucester along infrastructure corridors as far as South Gloucestershire. The assessment therefore took in a wide geography which includes *“not only the G1 and G2 sites, but also land at Wisloe and Sharpness (both identified as potential new settlements) and*

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<sup>3</sup> See EB105, Page 32

at Moreton Valence and Whitminster (which were subsequently to be identified as ‘potential growth points’ PGP1 and PGP2 in the 2020 Draft Local Plan Additional Housing Options Consultation)<sup>4</sup>. This is important as it clearly demonstrates that a wide geography and therefore range of options were considered as potentially being suitable to meet the needs of Gloucester.

- e. Despite the assessment adopting a wider ‘Study Area’ than was envisaged in the Emerging Strategy Consultation Paper, there appears to have been no re-evaluation of whether the spatial strategy and the distribution of strategic development to the two new communities remained justified and sound. On the contrary it appears to have been pre-determined that Whaddon was the Council’s preferred option to meet the housing needs of Gloucester before the evidence was produced and that, notwithstanding the outcome of that assessment or any other elements of the SLP evidence base, no changes were made to the spatial strategy in the SLP.
- f. On the basis that (a) the area of search in EB17a included all of the strategic options considered in the preparation of the SLP; and (b) the comparative sustainability of Whaddon over other proposed allocations (in particular Sharpness), we fundamentally object to the pre-conceived notion that the land at Whaddon should be ‘safeguarded’ and its future allocation depend upon an assessment of the housing needs of Gloucester.
- g. Indeed, it would not be ‘justified’, ‘effective’, ‘consistent with national policy’, or consistent with the strategic objectives of the SLP if the Land at Whaddon was held back from allocation purely and simply because it is also the most logical and sustainable location within Stroud to meet the future growth needs of Gloucester.
- h. Fast forward to the JCS review and the consideration of alternatives to meet the growth means of Gloucester City. Hypothetically, there is a possibility that the JCS Authorities prefer an alternative location to meet the needs of Gloucester. We do not comment upon the likelihood or soundness of such a decision here as it is not a matter for the Stroud Local Plan; however should that occur it would leave the most sustainable location within Stroud District (Whaddon) not allocated at the expense of less sustainable locations (such as Sharpness). The Local Plan could not then be said to be prepared on the basis that it is delivering sustainable development.

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<sup>4</sup> See paragraph 2.4.11

- i. One way to avoid this outcome is to allocate the Land at Whaddon to meet Stroud District's needs in the SLP and either allocate or safeguard the Sharpness New Community (or an alternative strategic location) to meet the needs of Gloucester. This approach would lead to a sound and sustainable Local Plan for Stroud without removing the opportunity for the authority to contribute towards the housing needs of Gloucester City. If the proposed Sharpness allocation is deemed to be unsound or that alternative strategic development locations represent more sustainable options, then these could be allocated or 'safeguarded' in its place.
  
- j. In summary, it is our contention that the Land at Whaddon represents the most sustainable location for strategic scale development within the District and that it should therefore represent a component of the housing supply for Stroud, allocated through the emerging Local Plan.

**Savills**

**01 February 2023**