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Reference Number: RCA142k

Dear Sir / Madam,

### Stroud District Council Local Plan review

RCA Regeneration has been instructed to submit representations to Stroud District Council following their publication of the Local Plan Review Issues and Options consultation document. Due to our client's interests, this representation focuses upon matters relating to residential growth within the District and, in particular, in Brimscombe.

In the first instance, it is considered a positive step by the Local Planning Authority to undertake a review of their adopted Local Plan. Such a review ensures that the plan remains up-to-date and relevant. This is particularly important in light of new proposed changes to the planning system being promoted by central Government.

However, prior to answering the specific questions detailed within the Issues and Options paper, it is considered important to address the Council's proposed timeframe. The published up-to-date programme states that the Local Plan review will be adopted by Winter 2021 / 22. While it is the Council's decision as to how long they will take to complete the review, such a timeframe would likely result in the Local Plan being deemed out-of-date significantly before the adoption date. The Government expect all Local Plans to be reviewed every 5 years. Given that the Stroud Local Plan was adopted in November 2015, then its review will need to be completed by November 2020 in order for the plan to remain up-to-date. As things currently stand, there will be a significant period whereby Stroud District Council does not have an up-to-date plan.

- Question 1.0a: "What are your priorities for Stroud District? Can you list your top 5 issues, challenges or concerns for the next Local Plan?"

Of the list of options proposed by the Local Planning Authority, the following are considered to be the most important.



- *9. Meeting the District’s identified future housing needs including the particular needs of the elderly and the needs of the travelling communities.*

A key component of any plan is to boost significantly the supply of new homes (paragraph 47 of the Framework). This national policy also requires Local Planning Authorities to “...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...”. Such national requirements clearly require the District to meet their identified housing needs.

However, the Local Plan review should take into account the Government’s newly proposed standardised methodology to calculating Objectively Assessed Housing Need (OAHN). This new approach, published September 2017, seeks, in part, to deliver on a key Government manifesto of building 1 million new homes by 2022. The consultation material issued by the Government identifies that the standardised housing needs figure is to be seen as a minimum; with each authority having the ability to increase such a figure where robustly justified.

As part of the consultation material, the Government has undertaken the relevant calculation for each individual authority; thus producing an initial indicative OAHN. For Stroud District Council, the calculation is indicating an annual housing need of 635 dwellings per annum between 2016 and 2026. In contrast, paragraph 2.28 of the Local Plan states that the current housing target is 11,400 dwellings between 2006 – 2031 (equating to 456 dwellings per annum). As such, the Government’s new methodology is proposing an increase of approximately 39% above the Council’s current housing target.

This substantial difference between the Government’s calculated OAHN and the housing growth target within the Local Plan demonstrates a significant concern. Without addressing the housing needs, the Local Plan will simply fail to boost significantly the supply of new homes (as per paragraph 47 of the Framework).

Specifically looking at the issue of housing for the elderly, the content of the Local Plan is somewhat contradictory. Paragraph 26 (page 10) of the Local Plan identifies that the number of over 65s in the District is anticipated to increase by more than 60% by the end of the plan period. Paragraph 15 of the Local Plan identifies that the aging population is most acute in the District’s rural areas. However, despite this, the Council then adopts a highly restrictive approach to housing growth. This restrictive approach focuses the majority of development to the larger urban areas; despite noting that the acute problems with an aging society are significantly worse in the rural areas. As such, the housing needs of the elderly are not being addressed by the Local Plan. Furthermore, the incorporation of very tightly drawn settlement boundaries removes the possibility of rural areas being able to provide the homes necessary to meet an aging society.

- *10. Working with neighbouring authorities to meet the needs of the housing market area as a whole.*

Correspondence between Stroud District Council and the neighbouring Gloucester Cheltenham and Tewkesbury (GCT) Joint Core Strategy (dated August 2014) acknowledged that the GCT authorities could only accommodate 33,200 new homes within their plan area. The correspondence states that Stroud District Council will work with the GCT authorities to help identify a methodology for addressing any housing shortfall should the 33,200 homes be considered insufficient.



Importantly, the newly proposed standardised OAHN methodology proposes a higher annual housing requirement than that currently being advocated by the GCT JCS. Accordingly, given that the three combined authorities cannot meet any further housing demand, there will be a requirement upon Stroud District to help meet this shortfall. Such a shortfall needs to be added on top of the Council's new OAHN figure arising from the Government's proposed standardised methodology.

- *11. Tackling the acute lack of affordable housing in the District.*

This is considered to be a significant issue within the District. The Council's Local Plan proposes a housing growth strategy of 456 homes per annum. This is despite the fact that policy CS9 acknowledges that there is a need of 446 affordable homes per year; i.e. 97.8% of all homes proposed in the District need to be affordable. Furthermore, paragraph 4.17 of the Local Plan states "*Affordability is expected to worsen over the next 20 years increasing the impetus for a greater supply of affordable housing within the District. The Council believes that both the very high level of housing need and the limited supply of land for housing justify a low threshold for affordable housing provision*".

Given that there is a such a high need, one would have expected the Local Planning Authority to proactively seek to rectify the problem. However, the Local Plan has allocated sites for residential development which are either unable or unlikely to deliver any affordable housing. Two examples of this are located in Brimscombe. Wimberley Mills is an allocated residential site which has been subject to a recent planning application (LPA Ref: 13/2668/OUT). Outline permission for 116 dwellings has now been granted on this site. However, the Local Planning Authority has accepted that no affordable housing can be delivered from this site. As such, a significant residential allocation of the Local Plan is unable to make any contribution to addressing the affordable housing needs of the District.

The Wimberley Mills site was the only site considered able to be delivered in Brimscombe during the early part of the plan period (i.e. before 2021). Other sites identified within the Local Plan were constrained due to the need to deliver suitable flood alleviation measures. During the Local Plan examination, no evidence was available as to what flood alleviation measures could be delivered and how they would impact upon any resultant development's viability. It is considered that substantial flood alleviation work will carry significant costs. This, in turn, will adversely impact upon a scheme's ability to deliver a raft of contributions required. Given that the Council is advancing a Community Infrastructure Levy, whereby financial contributions will be non-negotiable, the only aspect that can be removed to improve viability will be the affordable housing.

The above examples illustrate that the actions of the Local Authority have failed to address the critical affordable housing issues within the District. Failure to tackle this issue within the Local Plan review will perpetuate the shortfall and result in an imbalance within the housing stock.

However, there is a route to help address this issue. Given that reduced funding available to Registered Providers, it is considered that the most appropriate mechanism for addressing this housing need is to boost significantly the supply of new homes. By allocating further residential sites, particularly those without contamination or requiring flood alleviation measures, affordable housing will be delivered by way of new planning obligations.

- *12. Ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.*



Again, this is considered to be a fundamental issue that was not addressed within the adopted Local Plan. A number of sites have simply been allocated for housing development by virtue of the fact that they are brownfield / employment land. The desire to put housing on such sites has come at a cost whereby such new homes are not in close proximity to existing services or facilities. As a result, there is an increase reliance upon private motorised transport, resulting in unsustainable patterns of commuting. As part of addressing the future housing needs arising from this Local Plan review, housing should be concentrated within walking distances of key services.

- *13. Providing the right size of accommodation to meet local needs (particularly for smaller, cheaper market and affordable homes) and to help with social cohesion.*

As identified, specific sectors of society are being excluded from the housing market by the current Local Plan. New build housing for the elderly in rural areas is heavily constrained; despite the Council acknowledging that this is where the demand lies. Furthermore, as identified, the Council is failing to meet its affordable housing needs. At least in part, such a housing crisis results from the imposition of restrictive settlement boundaries that prohibit the ability to deliver the required homes necessary for social cohesion.

- Question 1.0b: *"Do you have ideas and suggestions for how the Local Plan might tackle particular issues?"*

As outlined above, adoption of the Government's standardised calculation to OAHN will result in an increase in housing numbers to the District. Such an increase can positively make a contribution to delivering an appropriate mix of accommodation size. Furthermore, if, following on from the increase in OAHN, the Local Authority allocate larger development sites, then affordable housing pressures will be addressed through the provision of s106 affordable homes. However, it is imperative that the Council allocates the right sites in the right locations. Simply allocating brownfield sites located away from services will fail to address the housing problem. This will merely perpetuate the inability of sites to deliver affordable housing through viability constraints.

A final issue is that settlement boundaries need to be less restrictive. Such boundaries have hardly changed since their initial inception in previous iterations of the development plan. It is important to note that windfall sites are finite. Without extensions to settlement boundaries, the housing needs will continue to go unmet.

- Question 2.3a: *"Tell us about housing needs and opportunities in your area".*

As already outlined, there is a significant issue in meeting housing needs in Brimscombe. The large-scale allocated site is unable to deliver affordable housing due to contamination detrimentally impacting upon viability. The viability of longer-term allocated sites within Brimscombe is also questionable due to the need to deliver unidentified flood alleviation techniques. As such, there is significant imbalance in the housing market in Brimscombe. Those in housing need simply are unable to be accommodated.

Notwithstanding the above, there is also a significant concern with part of the question which seeks comments regarding access to the private rented sector. The private rented sector (PRS) is not a form of affordable housing (as defined by Annex 2 of the Framework). Reliance on the PRS as a contributor to meeting affordable housing need has been subject to scrutiny within the planning industry. An example of this is within the Examination in Public into the Eastleigh Borough Council's emerging Local Plan. Within the Inspector's Report (published 11th February 2015) it states that *"...there is no justification in the Framework or Guidance for reducing the identified need for affordable housing by the assumed continued*



*role of the PRS with LHA [Local Housing Allowance]. This category of housing does not come within the definition of affordable housing in the Framework. There is not the same security of tenure as with affordable housing and at the lower-priced end of the PRS the standard of accommodation may well be poor...". The Inspector also states that "The Framework requires planning authorities to meet the housing needs of their area including affordable housing needs. The availability of accommodation within the PRS where households are in receipt of LHA is outside the control of the Council, being determined by the willingness of private landlords to let tenants in receipt of the LHA. The operation of the LHA is determined by the government".*

The above comments from the Eastleigh Plan Inspector notes that the Council has neither control over the PRS nor does it meet the planning definition of affordable housing. Furthermore, given the unregulated nature of the private rented sector, it is considered inappropriate that the Council attaches any significance to its role in meeting any housing needs of the District. The comments from the Eastleigh Plan Inspector are supported by a study produced by the Joseph Rowntree Foundation into the links between housing and poverty (April 2013). The report states that *"People in rented tenures face higher poverty rates than home-owners before and after housing costs. However, they are also particularly likely to experience housing-cost-induced poverty"* (p36). The JRF report recommends that in order to resolve the housing led poverty situation, it is necessary to build more homes, including affordable properties. For Stroud District Council to place any reliance upon the PRS is not supported. The PRS is unregulated and outside of the control of the Local Authority. Evidence illustrates that those reliant upon the PRS are in greatest risk of being in housing induced poverty. Therefore, any reliance upon this sector could put residents of the District at risk of poverty.

- Question 2.3b: *"Do you think that local housing need surveys should also be used to influence the housing mix on local for-sale housing sites?"*

This approach is supported but local housing need surveys should not be seen as a panacea to addressing housing issues. Instead, information should be obtained from a variety of sources including data available from the national census. A local housing needs survey might illustrate that, at the local level, there is a need for a certain type or size of household. However, strategically, the need for alternative forms of accommodation could be greater. Accordingly, the onus should be on the applicant to provide evidence to justify the proposed housing mix.

- Question 2.3c: *"Do you know of any suitable land for development to meet the housing needs of your neighbourhood, or do you have suggestions about how or where these needs might be met"*

Land south of Bourne Lane, Brimscombe is considered suitable and deliverable for housing development (see accompanying site location plan). Furthermore, it is available for development; having previously been promoted to the Local Planning Authority for inclusion within previous iterations of the SALA.

The site measures 1.88ha and, accordingly, can accommodate a development of sufficient homes capable of contributing to specific housing needs of the District. The representation site is not situated within the Cotswold Area of Outstanding Natural Beauty and is not within or adjacent to any defined heritage assets.

The site is situated adjacent to existing residential development and, following discussions with County Highways, a suitable access can be achieved via Bourne Lane. As such, the site's development would mirror the linear nature of existing properties immediately adjacent to the eastern boundary of the site.



The site is within walking distance to a range of services, as illustrated below:

Service	Distance
Convenience store and Post Office	210m
Pub	220m
Bus Stop	0m
Primary School	400m
Public House	230m
Village Hall	280m
Strategic employment opportunities	190m

Accordingly, based on the above, the site is not constrained by any footnote 9 designation and is capable of making a positive contribution to the housing needs of the District. The site is sustainably located and would not result in a reliance on private motorised transport for future residents.

- Question 3.1: "How should we meet future development needs?"

The first option of continuing to concentrate housing to a few large sites adjacent to the main towns in the district is not supported. This is because such an approach fails to address the housing pressures in the District. As noted, the Council acknowledge that there aging population pressures are more acutely felt in the rural parts of the District. As such, the housing needs of the elderly are going unmet by the current strategy. A more dispersed approach to growth should be taken; allowing housing to come forward in sustainable locations where it will help address housing needs.

Based on the above, a dispersed approach is supported. However, it is not possible to determine whether option 2 or option 3 is preferred. Both options are similar, albeit with option 3 being a more dispersed approach. However, crucially, the document does not state which settlements are being referred to under options 2 and 3. Without any clear context, a preferred response cannot be given. However, for clarity, preference is given for whichever option incorporates tier 3 settlements within the Settlement Hierarchy. Such settlements contain a high degree of services capable of meeting day to day needs.

- Question 3.5a: "How should development proposals on the edges of our towns and villages be managed?"

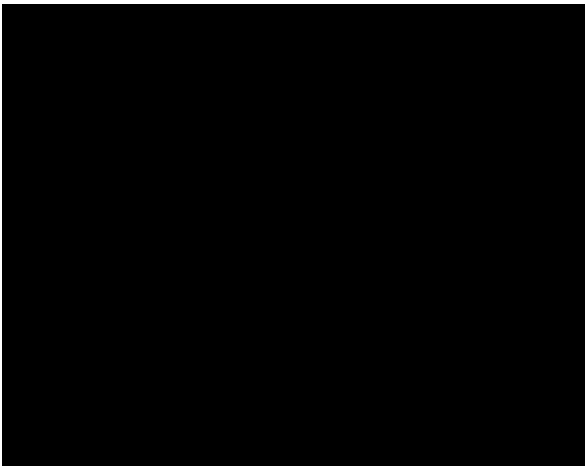
Of the options proposed, no support is given for the continued use of settlement boundaries. Such artificial boundaries restrict the ability to deliver new homes. Windfall sites within such boundaries are limited and, due to longstanding reluctance of extending boundaries, such windfall sites are now very limited. Furthermore, small-scale windfall sites are unable to deliver any proportion of affordable housing; for which there is a significant need. Ultimately, it is considered that the restrictive settlement boundaries are at odds with the requirements set out in paragraph 47 of the Framework which is to boost significantly the supply of new homes.



Based on the above, support is given to option 2 whereby proposals are assessed on a case by case basis.

Ultimately, it is considered a positive step by the Local Planning Authority to instigate a review of their adopted Local Plan. However, as detailed, the current timescale for the review is insufficient and fails to meet the Government's expectation that Local Plans are to be reviewed every 5 years. Furthermore, new standardised OAHN calculations, in conjunction with unmet need arising from the GCT administrative area, will require a significant increase in the number of homes to be contained within the review. Additionally, the significant need for affordable housing across the District, makes the need for further housing all the more urgent.

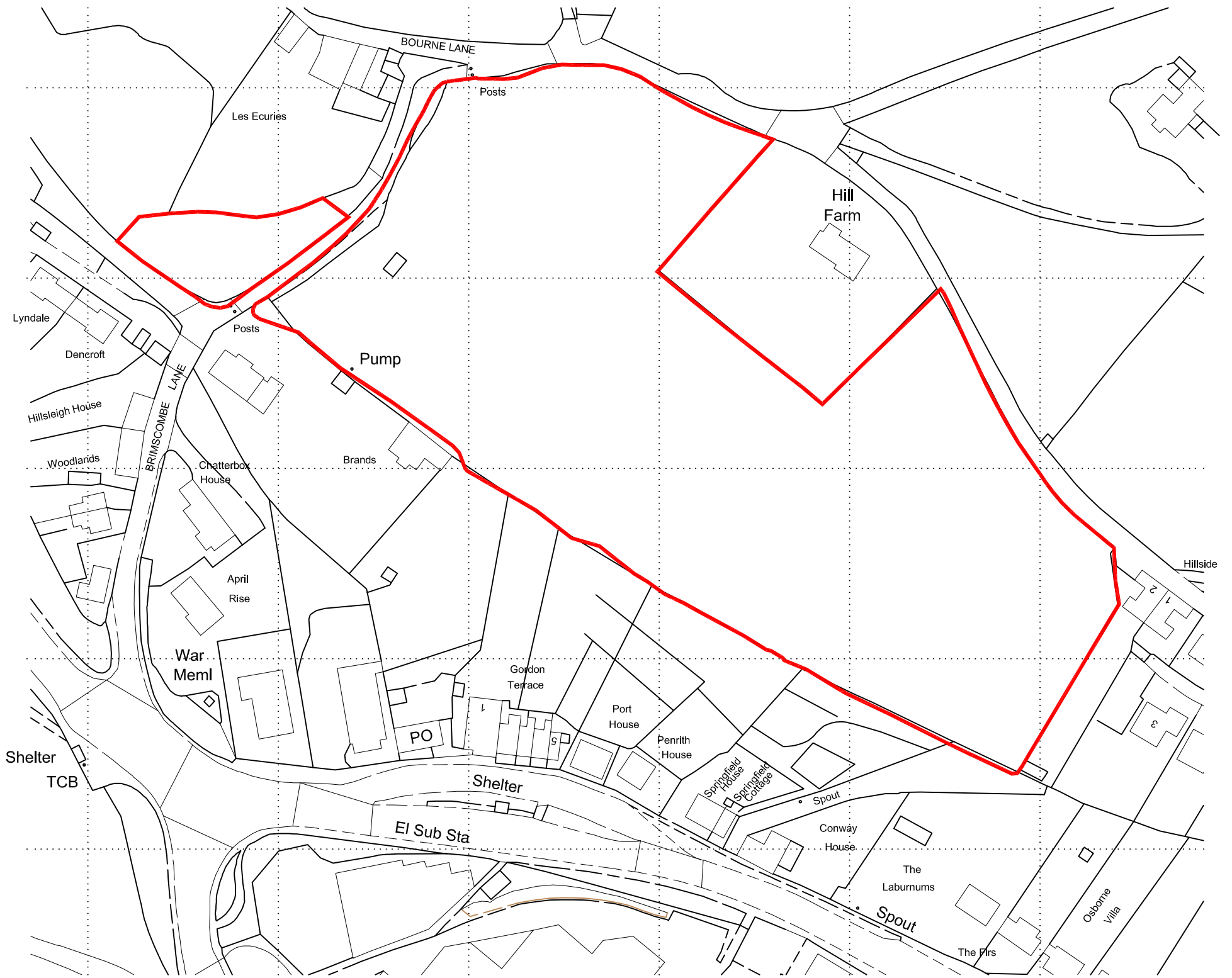
Yours sincerely,



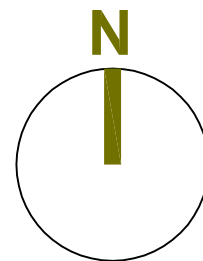
Enc.

- Land off Bourne Lane, Brimscombe – site location plan T211-001





revision	date	details



Job  
 Land off Brimscombe Lane  
 Brimscombe  
  
 Drawing Title  
 Location plan  
 Client  
 Parkroy Ltd  
 Date  
 15.05.15  
 Scale  
 1/1250@A3  
 Drawing No.  
 T211-001