

Development Services
Stroud District Council
Ebley Mill
Stroud
Gloucestershire
GL5 4UB

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800

www.gladman.co.uk

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By email only to: local.plan@stroud.gov.uk

RE: Stroud District Local Plan Review – Additional Housing Options Consultation

Dear Sir/Madam,

These representations have been prepared in response to the Local Plan Review: Additional Housing Options consultation, which provides the opportunity to comment on:

- The future housing requirement considering possible changes to the standard method for calculating housing need;
- Possible locations for additional housing land; and
- Whether reserve housing sites should be identified through the Local Plan Review.

The relevant documents have been published by Stroud District Council for public consultation from the 21st October 2020 to 16th December 2020 and form the latest stage in the preparation of the Stroud District Local Plan Review.

This consultation is being undertaken following the outcome of the previous consultation on the Draft Local Plan Review and in light of the possible changes to the standard method for calculating housing need, as outlined in the Government's recent 'changes to the current planning system' consultation. As requested by the Council, this representation does not repeat comments made by Gladman in previous rounds of consultation. The representation made by Gladman in January 2020 in respect of the Local Plan Review remain valid and should be read alongside this submission.

Future Housing Requirement

As set out in the consultation document, the Government has recently consulted on proposed changes to the method for calculating the minimum housing requirement for each local authority in the country. For Stroud this revised method increases the housing requirement from 638 homes each year (as detailed in the Draft Local Plan Review) to 786 new homes each year. Over the emerging plan period this results in an additional 1,050 – 2,400 new homes that need to be planned for, subject to the windfall allowance to be agreed through the Local Plan Review.

It is anticipated that the revised standard methodology will be subject to further tweaks in the coming weeks, nevertheless it is encouraging to see that the Council are alert to these changes and are taking a hands-on approach to addressing the potential impact a revised standard method for calculating housing need could have on the Local Plan Review.

Given the degree of uncertainty regarding the introduction of the revised standard method, Gladman reserve the right to comment on the housing requirement at a later stage of the plan-making process.

Question 1 and Question 2

Gladman welcome discussion on the spatial options for possible additional housing and consider that a more flexible spatial strategy would ensure the Local Plan Review can meet its established housing requirement over the plan period. The consultation document sets out the following five potential spatial options to accommodate additional housing growth:

- Option A: Intensify
- Option B: Towns & Villages
- Option C: Additional Growth Point
- Option D: Wider Dispersal
- Option E: Hybrid.

Gladman are supportive of a strategy which continues the use of a hybrid approach, in so much as it directs growth to a range of tiers of settlements. Gladman fully support the proportionate growth of sustainable rural centers as new development is often essential to maintain and enhance the vitality and viability of such settlements. However, development in smaller settlements needs to be pursued as part of a comprehensive spatial strategy that allocates a wide range of sites of various sizes across the district.

Considering this Gladman believe there is merit in focusing this hybrid approach on option B and option D, which encourage sustainable growth at the smaller towns and suitable villages within the authority. This approach would see the key settlements provide the focus for growth with smaller sustainable rural settlements all contributing meaningful levels of growth to ensure that housing requirements of the District are met. Distributing growth across the widest possible range of sites, by size and market location, also has the added benefit of significantly boosting housing supply because the widest possible range of products and locations are available to meet the widest possible range of demand.

This hybrid approach may or may not include a proposal for an additional new growth point, but if it does, this must be based on a realistic delivery timeframe towards the end of the plan period and the LPR must ensure housing need is not allowed to go unmet in the meantime.

Question 3

For the housing needs for the whole plan period to be met, it is essential to provide sufficient headroom within the housing land supply. Gladman consider that, rather than identifying reserve sites, it may be more appropriate for the Local Plan Review to provide for a 20% buffer of additional housing supply. This would be in line with recommendations from the Home Builders Federation and would ensure flexibility is provided for in the deliverable supply.

Question 4 & 5

If reserve sites were to be identified through the Local Plan Review, Gladman would be supportive of a hybrid approach as set out above.

Question 6

Should the Council consider it prudent for the Local Plan Review to allocate reserve sites it is essential that this policy is clear, easily understandable and effective, by setting appropriate mechanism which do not curtail sustainable development from being delivered.

Whilst apt, the two triggers suggested by the Council are lacking the necessary substance to ensure a reserve site policy could successfully address a shortfall in housing land supply. The triggers for allowing a reserve site to come forward must clearly set out the mechanism which would facilitate this, including appropriate timescales and target dates, in order to ensure that it is a meaningful policy mechanism.

Section 2: Additional Housing Options & Section 3: Sustainability Appraisal

Gladman do not have any specific comments to make with regards to section 2 and section 3 of the consultation document.

Conclusion

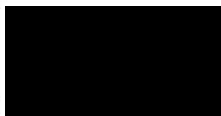
Gladman welcome the opportunity that has been provided by the Council to comment on the following proposals:

- The future housing requirement considering possible changes to the standard method for calculating housing need;
- Possible locations for additional housing land; and
- Whether reserve housing sites should be identified through the Local Plan Review.

We trust that the comments contained in this representation are informative and that the issues raised are taken into account and fully embraced by the Council through the preparation of the Local Plan Review. We look forward to engaging with the Council further in relation to our land interests as set out in previous representations and would welcome the opportunity for pro-active engagement with the Council on these matters.

Yours faithfully,





Graduate Planner
Gladman Developments