

Local Plan Review
The Planning Strategy Team
Stroud District Council
Ebley Mill
Stroud
Gloucestershire
GL5 4UB

SENT BY E MAIL ONLY TO
local.plan@stroud.gov.uk

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Dear Sir / Madam

STROUD LOCAL PLAN REVIEW (LPR) – ADDITIONAL HOUSING OPTIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our Members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions in the LPR - Additional Housing Options consultation document.

Spatial Options - Additional Housing Land

Question 1 : Which strategy option(s) would you support, if additional housing land is required?

The HBF would support Option E - Hybrid / Combination.

Question 2 : If you answered yes to Q1e above, please explain which of the spatial options (A- D) you would like to see combined in a hybrid strategy, and why?

There are disadvantages to pursuing any one proposed Strategy Option in isolation, therefore the HBF support Option E for a combination of Options A – Intensify, B – Towns & Villages, C – Additional Growth Point and D – Wider Dispersal.

In isolation Option A for intensification of current urban expansion sites is unlikely to meet all development needs due to a limited capacity for higher densities, which will only be appropriate in certain locations. A blanket approach to increasing housing densities in current urban expansion sites would provide insufficient variety in house typologies to create the right types of new homes to meet the housing needs of different groups. The deliverability of intensely



developed residential schemes will also be influenced by future market demand for such high density living post Covid-19. A range of density standards specific to different areas of current urban expansion sites will be necessary to ensure that any proposed density is appropriate to the character of the surrounding area.

Long lead in times for the commencement of on-site development and build up to optimum delivery rates are associated with large strategic sites such as proposed under Option C, therefore any Additional Growth Point(s) should be complimented under Options B & D with smaller non-strategic sites at Towns & Villages in Tiers 2, 3a & 3b and / or Wider Dispersal to Tier 4 settlements. This will ensure a continuous housing land supply (HLS) in the short to medium term. Options B & D will also support local communities living in smaller towns and rural villages.

Housing delivery is optimised where a wide mix of residential sites is provided. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.

Spatial Options - Reserve Housing Supply

Question 3 : Do you support the approach of identifying a reserve site or sites, if housing development on the sites that will be allocated in the Local Plan should fail to come forward as envisaged?

The HBF do not support the approach of identifying a reserve site or sites.

The Stroud LPR should ensure the availability of a sufficient supply of deliverable and developable land to deliver Stroud's housing requirement. The sufficiency of the housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Years Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements.

The Council's focus should ensure delivery of sufficient identified and allocated residential development sites to fully meet the housing needs of Stroud. If the Council fails to meet its housing requirement, maintain 5 YHLS or achieve HDT, a LPR should be immediately commenced.

Question 6 : What should trigger a reserve site (or sites) coming forward?

The HBF do not support a reserve site(s) approach because of the difficulty in setting out clear "triggers" for bringing forward such sites, which do not create uncertainty.

New Housing Sites & Potential Growth Points

The HBF have no comments on the five identified housing sites and the two proposed potential growth points at Grove End Farm, Whitminster (circa 2,250 dwellings) and Moreton Valence / Hardwicke (circa 1,500 dwellings). However, the HBF expects the Council's assessment of availability, suitability, deliverability, developability and viability of identified sites to be realistic. Assumptions on lead in times and delivery rates should be accurate and supported by relevant landowners and developers.

Using the current standard methodology calculation, the minimum local housing need (LHN) for Stroud is 12,760 dwellings (638 dwellings per annum) between 2020 – 2040. Table 1 shows the Council's overall HLS is 14,670 dwellings comprising of existing commitments for 4,595 dwellings, 8,725 dwellings on proposed allocations in the Draft LPR plus a windfall allowance of 1,350 dwellings. This provides a contingency surplus of 1,910 dwellings (15%). The HBF supports the inclusion of a contingency. There is no numerical formula to determine an appropriate quantum for a contingency but where HLS is focussed on one or relatively few large strategic sites or settlements / locations, greater numerical flexibility will be necessary than in a case where HLS is more diversified.

The revised standard methodology increases the minimum LHN for Stroud to 15,720 dwellings (786 dwellings per annum) between 2020 – 2040. As shown in Table 1, there is a resultant deficit of 1,050 dwellings excluding any contingency in the planned HLS. If a 15% contingency is to be maintained, an additional 2,358 dwellings are needed. The total potential shortfall in HLS is 3,408 dwellings.

It is noted that the five identified sites total 115 dwellings representing only 11% of the potential minimum shortfall in planned HLS of 1,050 dwellings. The HBF conclude that to meet the potential HLS shortfall including a contingency Growth Point(s) and more non-strategic sites across settlements in Tiers 2, 3a, 3b and 4 should be identified and allocated.

Conclusion

It is hoped that these responses are helpful to the Council in informing the pre-submission stage of the Stroud LPR. If any further information or assistance is required, please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans