

Examination of the Stroud District Local Plan Review (Crest Nicholson: 897)

Matter 2 Spatial Strategy and Site Selection Methodology

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?

5. *Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?*

No comment is offered on the robustness of the strategy overall or the delivery prospects of the two new settlements. However, the Hunts Grove extension is in the process of being delivered and is the subject of live pre-application discussions with the planning authority, in support of which the terms of a planning performance agreement are being negotiated currently. The application is being advanced pursuant to the provisions of Policy SA4 of the adopted Local Plan, with regard also paid to relevant policy criteria contained within the emerging Plan.

13. *Core Policy CP4 states that all development proposals shall accord with the mini visions, have regard to the guiding principles and shall be informed by other relevant documents. It also identifies that development will be expected to integrate into the neighbourhood, place shape and protect or enhance a sense of place and create safe streets, homes and workplaces.*

- a. *Is the approach in the policy justified and effective? Is its intention clear and is it consistent with national policy?***
- b. *Does the policy set out clear development requirements, or are these more clearly defined in other Plan policies? If so, why is there duplication?***
- c. *Reference is made in the policy's supporting text, at paragraph 9.22, to the National Design Guide. How does the policy relate to the updated 2021 version of this national guidance?***

Crest has commented on the provisions of CP4 via representations in December 2019 (R.18) and July 2021 (R.19) and maintains this stance. On the basis that the objective underpinning the policy is to create locally distinct places that accord with the 'Mini Visions' through the delivery of development that is harmonious and complimentary to its setting the need for this general policy is questioned. It is contended that the objectives behind the policy could be achieved more effectively and with greater clarity if the founding principle of the policy is expressed in terms of consistency with the *Components for good design* that are set out in the National Design Guide (p.5 paras 20-32) and the ten characteristics that follow as the overarching objective at the start of the Making Places section of the Local Plan (3.0). This would avoid unnecessary duplication.

To achieve the desired outcome each of the Mini-Visions should then be related to the ten characteristics of good design and the locally specific baseline elements that should be reflected in design outcomes. Alternatively, the Mini Visions could be used as introductions to locally specific Design Guides that are prepared to inform development proposals that come forward within each area. These could be prepared as supplementary documents to support the policy aspirations of the Local Plan. A precise wording is not proposed because there are several options available to the Council to render the policy clearer and specific to locations within the district. Currently, the generic nature of CP4 and the overlapping nature with the National Design Guide indicate that it is an unnecessary inclusion.

14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?

Crest has commented consistently on the Vision to 2040, which says little about the purpose of the Local Plan. It is difficult to determine whether the spatial strategy will achieve the Vision because the Vision does not actually look forward to a point in the future when the implementation of the proposed policies has achieved a discernible outcome. The five paragraphs do not articulate how the district will have changed (for the better) through the realisation of the policies that the Plan contains.

17. Core Policy CP3 lists Hunts Grove as being a tier 2 local service centre (anticipated). Yet paragraph 2.9.19 states that Hunts Grove is not included within the settlement hierarchy. Can the Council clarify this and also explain why Hunts Grove is 'anticipated' as a tier 2 settlement?

Submissions in respect of this question are made via the representations dated 21/07/21 (Participant Reference: 897). In support of these points, it is relevant to note that the main Hunts Grove site (established in the 2005 version of the Local Plan, not the 2015 Local Plan as stated incorrectly at para. 2.4.5) is now around 1,000 completions, with the latest development trajectory for the site indicating completion by March 2027. The Statement of Common Ground with the Council relating to the extension land (SA4/PS30) assumes commencement in the period 2020-25, with completion of development within 10 years.

18. Have implications of the larger strategic allocations on the existing settlements and their place within the settlement hierarchy been robustly assessed?

Attention has been drawn to the potential anomaly applying to the categorisation of Hunts Grove as an 'anticipated' tier 2 Local Service Centre in the Local Plan under CP3 referred to above in the context of question 17. No comment is offered on the proposed strategic allocations apart from the Hunts Grove extension, which should be addressed specifically under CP3 because it is the only strategic growth proposal within this category and because it maintains an existing policy commitment contained in the adopted Local Plan. It would be appropriate to make specific reference to Hunts Grove as a Local Service Centre (removing the qualification applied) because it is a committed development that is in the process of being delivered. Hunts Grove should be identified as a Local Service Centre and its strategic significance highlighted in accordance with the approach set out within the representations dated 21/07/21 (897 – p.3 – The Development Strategy Headlines). The Policy could be redrafted to correct the anomaly:

Tier 2 – Local Service Centres

Hunts Grove; Berkeley, Minchinhampton, Nailsworth, Painswick, Wotton Under Edge

Hunts Grove is a new neighbourhood on the southern edge of Gloucester allocated in the Local Plan originally in 2005. It is allocated for strategic expansion (750 dwellings) in the Local Plan, carrying forward a development commitment identified in the 2015 Local Plan. It forms a major part of a key strategic growth location in the northern part of the district adjoining the southern edge of the City of Gloucester. The five market towns and large villages comprising the remaining Local Service Centres have the ability to support sustainable patterns of living in the district because of the facilities, services, and employment opportunities they offer. They have potential to provide for sustainable growth commensurate with their size and function to provide new homes, jobs, and infrastructure, principally through sites allocated in the Local Plan.....Further development will be achieved through development within settlement limits.....