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10th February 2023

C/O Charlotte Glancy
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Dear Madams,

Further Written Statement to the Stroud Local Plan Examination – Inspectors’ Matters, Issues and Questions – On Behalf of Bloor Homes, Pursuant to Land South of Walk Mill Lane, Kingswood

This further written statement has been prepared by Ridge and Partners LLP on behalf of Bloor Homes, to respond to the issues and questions set out in the Inspectors’ Matters, Issues and Questions (MIQs) of the Stroud Local Plan Examination, this statement is written pursuant to Land South of Walk Mill Lane, Kingswood.

As per the guidance contained within the Examination Guidance Note, this statement responds solely to Matter 2: The Spatial Strategy and Site Selection Methodology, is within the 3000-word limit and only responds to the specific questions in the MIQs which are of relevance to the original representations made to the emerging local plan.

As required, electronic versions of this statement as well as two paper copies have been sent to the Programme Officer.

This statement proceeds to respond to each question relevant to Land South of Walk Mill Lane, Kingswood, in turn:

Vision and objectives

Question 1: Does the Plan set out a suitably positive and realistic vision for the future development of the District as a whole?

The plan’s vision is positive in respect to its stance on market towns, where it recognises that the district.

...supports a network of market towns, well connected to their rural hinterlands and complementary of the role of the wider regional centres. Each contributes to our sustainable and thriving local economy.

Question 2: What is the purpose of the 'Mini Visions' referred to in Core Policy CP4 and set out under each sub-area of the Plan? Do Maps 5-12 within the Plan reasonably reflect the spatial visions for each sub-area? Are these visions justified and do they adequately reflect the overarching Plan vision?

This representation is supportive of the 'Mini Vision' regarding the Wotton Cluster, which primarily aims at improving access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality.

Particularly where the vision recognises that:

Kingswood is a thriving village within an attractive landscape setting which benefits from its proximity to Wotton-Under-Edge and access to local employment boosted by pleasant and safe walking and cycling links connecting Kingswood, Wotton-Under-Edge and Charlfield and other key local destinations.

Given this recognition, and as detailed in response to the responses to subsequent questions in this statement, it is considered that further housing development at Kingswood would help support this 'mini vision'.

Question 3: Have the seven strategic objectives (S01, S01a and S02-S06), included in Chapter 2 of the Plan, been positively prepared, are they justified and are they consistent with the overall vision and the priority issues facing the District?

The strategic objectives are derived from the above visions in order to create a tangible way of taking forward the overall vision for the district and to aid the assessment of the relative merits of potential locations for strategic growth.

This representation particularly notes strategic objective S01 which concerns accessible communities and seeks to maintain and improve accessibility to services and amenities with affordable and quality housing for local needs. This representation also supports Strategic Objective S03 which seeks to improve the safety, vitality and viability of the town centres, which link to and support the needs of their rural hinterlands. As well as S04 which aims to promote healthier alternatives to the use of the private car and seeking to reduce CO2 emissions by, inter alia, active travel.

These are considered consistent with the aims of the Wotton Cluster's 'mini vision' which seeks to improve access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality.

Spatial Strategy

Question 4: Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?

Question 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?

The above questions are answered in tandem given that the spatial strategy of the plan is primarily reliant on the delivery of most of its growth on a small number of strategic development sites.

It is noted that a considerable amount of the emerging plan's housing requirement is proposed at two locations; Sharpness and Wisloe, which between them are identified to deliver 3,900 homes over the plan

period (as well as a further 2,600 beyond). It is considered that greater flexibility is required in order to ensure that the Council can continue to meet its housing requirement, should one or both of the above sites not deliver at the rate anticipated. There is a concern that not enough small-to-medium sized sites have been allocated for growth, and that the trajectory for housing growth in the district without such sites will be unbalanced, with the considerable amount of time it takes to realise outline approval, reserved matters approval, discharge of conditions and eventual build out of strategic sites. There is a requirement therefore for further small- to-medium sites to sure up the short to medium term position.

Kingswood is identified in the plan as suitable for more housing development, with an allocation for 50 dwellings, with the plan identifying that appropriate development will be supported to sustain and enhance Kingswood's role function and accessibility as an Accessible Settlement with local facilities within the Wotton Locality. Kingswood therefore contains a number of services and facilities and is able to accommodate additional growth over that already planned.

It is considered therefore that the strategy should allow for further housing sites at smaller towns and larger villages including a range of additional housing sites across Tier 2 and 3 settlements, with the spatial strategy being over reliant on the delivery of two sites.

Such an approach would promote a more sustainable pattern of development within the district and is required by the NPPF which in Paragraph 68 sets out that when identifying land for homes the local planning authority should promote the development of a good mix of sites. Paragraph 68 also states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

A more sustainable strategy would incorporate an increase to the number of dwellings allocated to outside of the larger strategic sites. This would not only make delivery more robust across the plan period, it would also ensure the development is more appropriately spread across the district, improving delivery and reducing the risk of reduced delivery rates as a result of competition, and spreading the delivery of affordable housing more appropriately around the district.

It is noted that in the preferred options consultation, the Council's option 3 Development Strategy (Dispersal) showed a total of 3780 could be delivered via a wider distribution of housing across the district, yet only 985 dwellings have been allocated to Local Development Sites. With the entire Wotton Cluster only having 50 dwellings allocated to it. This appears to be as a result of the settlement of Wotton-under-Edge being highly constrained, but ignores the opportunity to locate further development at Kingswood which functions very much in relation to Wotton Under Edge.

As outlined in the I&O consultation, Wotton is a very large settlement, and has a strong 'strategic' retail role as one of the district's 5 town centres, serving a wide catchment. It offers a very good level of local community services and facilities (GP, dentist and pharmacy, primary school and pre-school provision, post office, place of worship, pub, town hall sports / playing fields Settlement role and function and playground) and has an important role in providing a diverse range of 'strategic' services and facilities to a wider catchment (bank, secondary school and 6th form, library, cinema, swimming pool and leisure centre). Access to key services and facilities here and elsewhere is very good, and therefore to sustain this function locally, further allocation should be allocated to support the local economy.

Question 11: Will the spatial strategy promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy?

As identified above, the spatial strategy of the plan is primarily reliant on the delivery of most of its growth on a small number of strategic development sites.

It is considered therefore that the strategy should allow for further housing sites at smaller towns and larger villages including a range of additional housing sites across Tier 2 and 3 settlements in order to supporting housing delivery in the early stages of the plan, promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy.

In this respect, Kingswood is designated a Tier 3a settlement defined in the Draft Plan as:

“generally well-connected and accessible places, which provide a good range of local services and facilities for their communities. These villages benefit from their proximity and/or connectivity to higher tier settlements or transport corridors, which enables access to employment and key services and facilities elsewhere, and which may offer some scope for further transport and accessibility improvements. These are relatively sustainable locations for development.”

The draft local plan identifies such locations as sustainable locations for development:

“These are relatively sustainable locations for development, offering the best opportunities outside the District’s Main Settlements and Local Service Centres for greater self-containment. Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements.”

The draft plan also states that Kingswood offers a ‘good’ level of local community services and facilities as well as ‘very good’ access to key services and facilities elsewhere. The Draft Plan also identifies that from a landscape sensitivity perspective, the preferred directions of housing growth are to the southwest and southeast of the village, the subject site being located to the southeast.

Paragraph 78 of the NPPF is supportive of delivering housing development in such areas, it states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

Additionally, Kingswood has a recognised employment role: as well as two key employment sites within the village, the nearby Renishaw acts as an employment hub. The employment offering of Renishaw is set to substantially increase following the draft allocation – PS47. Renishaw already employees 1,750, with the plan allocating 10 hectares for its expansion. Local affordable housing would be a sustainable approach to accommodating the young skilled workforce locally.

Kingswood therefore should be supporting a higher level of housing growth than that set out within the draft plan, in order to support these services and facilities as well as its employment offerings. In this instance, Land to the South of Walk Mill Lane, Kingswood is well placed to deliver the housing growth in Kingswood.

Whilst a development of 95 dwellings exceeds the currently allocated number of dwellings for the village, there is no evidence to suggest the settlement and the surrounding area cannot accommodate the additional number and wouldn’t produce an imbalance in the council’s growth strategy.

A further allocation at Land to the South of Walk Mill Lane, Kingswood would therefore enable the spatial strategy to better promote the vitality of town centres in the district and support a very prosperous rural economy. Indeed one that is quite unique in the District.

Question 14: Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council’s vision?

As identified above, the spatial strategy of the plan is primarily reliant on the delivery of most of its growth on a small number of strategic development sites.

It is considered therefore that the strategy should allow for further housing sites at smaller towns and larger villages including range of additional housing sites across Tier 2 and 3 settlements in order to promote the vitality of town centres in the District and support a prosperous rural economy.

Kingswood is a sustainable location to accommodate this distributed housing growth. Development at the site will also provide a valuable supply of open market and affordable housing to a locality where there is an acute housing shortage of both market and affordable dwellings. The supply of affordable housing stock will therefore help reinforce social cohesion in the local community by contributing to the ability of family connections to continue to reside in the area, whilst also ensuring young people have the opportunity to stay within Kingswood and the surrounding villages in an area which is becoming increasingly unaffordable; helping to thereby ensure a more balanced community.

This will therefore assist in alleviating a key issue stated in the emerging strategy a strategic objective in helping to ensure there is adequate provision of affordable housing and housing opportunities for younger people and ensuring younger people are able to stay within rural neighbourhoods.

Settlement Hierarchy

Question 15b: Core Policy CP3 states that proposals for new development should be located in accordance with the hierarchy. The Council indicates this will assist in delivering sustainable development, by concentrating growth in those settlements that already have a range of services and facilities.

It has been suggested by representors that some settlements (including Minchinhampton, Painswick, Chalford and Kingswood) should be re-categorised within the hierarchy. Does the settlement hierarchy accurately reflect the role and function of different settlements within the District and are the settlement categorisations justified by robust and up-to-date evidence?

This representation considers that there is scope to reclassify Kingswood as a Tier 2 settlement given its services and facilities nearby as well employment opportunities such as at Renishaw. At least, there is justification for a higher level of housing development to be allocated at Kingswood.

Kingswood is identified in the Draft Plan as a Tier 3 Settlement – defined as generally well-connected and accessible places, which provides a good range of local services and facilities for their communities. In Kingswood's case it is also close to Wotton-under-Edge which is highly constrained by the AONB (also constrained by the topography of the area) and the Site therefore offers the opportunity to achieve some of the growth that might have otherwise been provided in this Tier 2 settlement. The draft local plan identifies such locations as sustainable locations for development:

“These are relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment. Some of these settlements outside the AONB may have scope to help meet the housing needs of more constrained Tier 1 or Tier 2 settlements.”

Given the range of services, facilities, employment opportunities and constrained nature of Wotton-Under-Edge, it is considered that Kingswood could reasonably be categorised as a Tier 2 – Local Service Centre, defined in the plan as:

These market towns and large villages have the ability to support sustainable patterns of living in the district because of the facilities, services and employment opportunities they offer. They have the potential to provide for modest levels of jobs and homes, including through the sites allocated in this

plan, in order to help sustain and, where necessary, enhance the services and facilities, promoting better levels of self-containment and viable, sustainable communities.

It has been established that the site adjoins Kingswood which is a sustainable location being accessible both to a range of local services, such as shops, employment opportunities and public transport.

There are significant employment opportunities nearby. As well as two key employment sites within the village, the nearby Renishaw acts as an employment hub. The employment offering of Renishaw is set to substantially increase following the draft allocation – PS47 for its expansion.

Finally, the provision of additional housing at Kingswood is able to support the needs of Wotton-under-Edge whose growth is highly constrained by the AONB which places serious limitations on the scale and nature of development in the Wotton Cluster sub-area and the accompanied need for sustainable sites which are free from such constraints and are deliverable to meet the demand for housing.

These reasons therefore justify the notion that Kingswood could be reclassified as a Tier 2 settlement given its sustainability credentials and ability to cater for housing growth that can't be located at Wotton-Under-Edge given its constraints. At least, there is justification for a higher level of housing development to be allocated at Kingswood, even if it were to remain a Tier 3 settlement.

Conclusions

A more sustainable strategy would incorporate an increase to the number of dwellings allocated to outside of the larger strategic sites. This would not only make delivery more robust across the plan period, but it would also ensure the development is more appropriately spread across the district, improving delivery and reducing the risk of reduced delivery rates as a result of competition, and spreading the delivery of affordable housing more appropriately around the district.

Kingswood should be reclassified as a Tier 2 settlement given its sustainability credentials and ability to cater for housing growth that can't be located at Wotton-Under-Edge given its constraints. At least, there is justification for a higher level of housing development to be allocated at Kingswood, even if it were to remain a Tier 3 settlement.

Kingswood should support a higher level of housing growth than that set out within the draft plan, in order to support these services and facilities as well as its employment offerings. In this instance, Land to the South of Walk Mill Lane, Kingswood is well placed to deliver the housing growth in Kingswood.

A further allocation at Land to the South of Walk Mill Lane, Kingswood would enable the spatial strategy to better promote the vitality of town centres in the district and support a very prosperous rural economy. Indeed, one that is quite unique in the district.

As has been demonstrated through previous representations to the emerging plan, the Land to the South of Walk Mill Lane, Kingswood, can be delivered without any unacceptable adverse impacts and with associated economic, social and environmental benefits.

I trust the enclosed information is adequate at this point, however, please do not hesitate to contact me should you require any further information.

Yours faithfully,

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For Ridge and Partners LLP

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