



## Document Control

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For and on behalf of Copperfield L&P Ltd

Revision	Date	Notes	Prepared	Approved
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# 1. Matter 2 Spatial Strategy and Site Selection Methodology

## 1. Introduction

1. Copperfield is instructed by CFL who made representations to the Local Plan in January 2018, January 2020 and July 2021 (Regulation 19). CFL is a landowner on the border of Gloucester's administrative area and has land at Hunts Grove, and around Quedgeley East Business Park and Haresfield.
2. Details of land ownership have been provided as part of a Statement of Common Ground in respect of Quedgeley East Business Park. Crest Nicholson has also submitted representations in respect of Hunts Grove as developer.
3. This hearing statement reflects the representations previously made and is focused on the Inspectors' MIQs that are relevant or need additional expansion beyond those submissions.

*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?*

### Vision and Objectives

4. **Question 1:** The vision set out on page 19 of the eSDLP is currently too vague and makes it difficult to relate to the subsequent policies of the plan. In this context it is not effective as presently written. CFL suggest the vision should:
  - Identify the importance of Stroud and its strategic location and explain what the outcome of key eSDLP policies will be.
  - The outcomes should be reasonably measurable whether in terms of qualitative or quantitative terms. An effective vision may set parameters for housing and economic growth as well as environmental and community outcomes. One example may be to reduce housing poverty by delivering 'x' market and 'x' affordable homes, another may be to support the self-containment of settlements and walkable neighbourhoods, both of which can be defined in quantitative and qualitative terms.
5. CFL suggest a clear vision expressed in these terms which addresses each chapter of the eSDLP would be effective.

### Spatial Strategy

6. **Question 3:** Paragraph 2.3.18 does not explain the importance and scale of growth at Hunts Grove/ Hardwicke. The development strategy should emphasise its importance to ensure there is consistency between the text and the development strategy diagram on page 24 of the eSDLP

7. **Questions 4 and 5:** The eSDLP does not effectively address the rural areas sufficiently. The list of settlements at 2.3.21 ignores a wide range of other sustainable settlements or settlements whose sustainability and response to climate change could be improved through positive planning. The eSDLP should provide a strategy for these settlements especially where consideration is being given to the production of neighbourhood plans. The eSDLP's silence regarding these settlements is not effective. Given their limited quantity within the district it is a strategic matter that should be addressed.
8. CFL suggest that for the plan to be effective, it should set a strategic objective of improving the overall sustainability of Tier 3, 4a and 4b settlements through positive development proposals.
9. **Question 9:** On the basis that Hunts Grove should be identified as a Local Service Centre (Tier 2 settlement), it would be ineffective to then refer to modest growth taking place in the text on page 55 of the eSDLP.

#### Settlement Hierarchy

10. **Question 15 and 24:** The general lack of a strategic approach for smaller villages is not consistent with paragraphs 77 and 78 of the NPPF. The Stroud District Settlement Role and Function Study Update 2018 does not address the impact of decline, but simply categorises villages according to their existing services. This type of laissez-faire approach does not get to the heart of the objectives set by the NPPF2018:

*“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” (NPPF2019 paragraph 78)*

11. The Stroud District Settlement Role and Function Study (Update 2018) does not consider the latter part of the NPPF requirement to look at combinations of settlements and their proximity and support for collective services. The study only considers each settlement in isolation of its surroundings.
12. CFL suggests that SDC should take a fresh approach to planning a sustainable development strategy for villages, as set out by Country Land and Business Association in the ‘Sustainable Villages – Making Rural Communities Fit for the Future’ report:
  - Villages are not allocated housing and have very limited development options to improve their sustainability, leaving them in a cycle of decline;
  - Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services; and



- Technology is shaping modern life and Councils should consider the availability of broadband in the sustainability assessments of villages.

13. CFL is not advocating major growth at villages, but rather a pragmatic and sustainable response to decline to enable the delivery of a plan which is effective across all parts of the plan area.

1.1.1 There is no robust evidence to support a policy limit of 9 dwellings at villages or a maximum of 10% growth. For villages to thrive it is important to assess the social, economic and environmental impacts of a proposal upon a given settlement, for example, affordable housing need or support for local services and schools to reduce reliance on in-commuting.

14. **Question 17:** Hunts Grove is a well-advanced location with a newly formed Parish Council and a wide range of existing, built, and emerging infrastructure. It should therefore be at Tier 2 Settlement to further support the local community's aspirations.

End 12.02.2023