

EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

MATTER 2:

Spatial Strategy and site selection methodology

On behalf of: Robert Hitchens Ltd

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Pegasus is instructed by Robert Hitchins Ltd to submit a Statement in respect of Matter 2, pursuant to the Matters and Questions identified by the Examination Inspectors.

Separately additional Statements have been submitted in respect of the following Matters:

- Matter 1
- Matter 2
- Matter 3
- Matter 6
- Matter 6a
- Matter 6c
- Matter 6d
- Matter 6g
- Matter 7
 - Matter 7a
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 - Matter 10d
- Matter 11
 - Matter 11a
 - Matter 11b
 - Matter 11c

Following the submission of the Reg 19 representations in July 2021 Pegasus along with PFA Consulting and Pioneer Housing and Development Consultants have also responded to the Stroud District Local Plan Review Additional Technical Evidence in October 2022.

The Hearing Statements should be read alongside our representations and supporting evidence. As instructed, we have not repeated our representations of July 2021 or October 2022; but instead sort to highlight the salient points in response to the MIQs and indicated what changes we consider necessary in order for the Plan to be found sound.



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2. MATTER 2 – SPATIAL STRATEGY AND SITE SELECTION METHODOLOGY

2.1 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?

(Please note that these questions relate to the overall spatial strategy and the site selection methodology. Further questions on unmet needs and specific site allocation are set out under later matters.)

Vision and objectives

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

1.1 The Vision is supported – it is how this is interpreted and addressed by some of the proposed allocations that is the issue.

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?

2.1 This is a question more for the Council to respond.

3. Have the seven strategic objectives (SO1, SO1a and SO2–SO6), 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?

3.1 The seven strategic objectives take account of the identified issues and priorities set out in Chapter 1. They have been positively prepared and are consistent with the overall vision and priority issues identified.

3.2 However, the concern is how these are then reflected in the strategy of the Plan. For example, how Strategic Objective SO5 Promoting a development strategy that reduces the District’s carbon footprint, adapts to climate change, and respects environmental limits. It is considered that meeting the housing needs of the district is not well served by proposing a major allocation at Sharpness. As we have set out in our representations such an approach is not consistent with concentrating housing at locations where there is currently the best access to services, facilities, jobs, and infrastructure; neither it is consistent with concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth.

3.3 Transport is not identified as a separate issue; however, it is acknowledged that this cuts across all issues. Nevertheless, in achieving sustainable development this is a fundamental issue to be addressed and also in respect moving the district towards becoming carbon neutral by 2030. The PPG on Climate Change refers to opportunities to integrate climate change mitigation and adaptation objectives into the Local Plan. Examples of mitigating climate change by reducing emissions: Reducing the need to travel and providing for sustainable transport, thus supporting locations that provide the



potential for new and expanding public transport services well related to infrastructure corridors. This is addressed in more detail in our representations.

Spatial strategy

The Framework states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (paragraph 20). Chapter 2 of the Plan sets out the Development Strategy and a number of 'development strategy headlines' are also set out in text (page 23).

The Plan identifies, in the supporting text for Core Policy CP2, that the objectively assessed needs of the District for the period 2020-2040 will be met through a strategy which concentrates most development at a series of strategic sites to be 'located at the principal settlements within the District, at new settlements and within the key employment property market areas...'. Smaller scale development is expected to come forward in accordance with the settlement hierarchy. However, the policy mainly just lists the proposed strategic growth and development locations.

Core Policy CP4 is described as 'Making Places: a Spatial Vision for Stroud District'. It sets out a number of development principles which appear to be covered by other policies within the Plan.

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?
 - 4.1 Elements of the spatial strategy are justified by robust evidence and in the main the spatial strategy seeks to promote a sustainable pattern of development in accordance with paragraph 11 of the NPPF. However, there are two exceptions – the proposed new settlements at Sharpness and Wisloe. In particular, the proposed new settlement at Sharpness does not prioritise growth at sustainable locations.
 - 4.2 Paragraph 11 of the NPPF (2021) states that for plan making this is promoting a sustainable pattern of development that seeks to "*meet the development needs of their area; align growth and infrastructure, mitigate climate change (including making effective use of land in urban areas) and adapt to its effects;*" (my emphasis)
 - 4.3 It is considered that the new settlement at Sharpness does not align growth and infrastructure – this is set out in our representations to the Reg 19 Plan and subsequently in response to the consultation on the Additional Technical Evidence (Oct 2022).
 - 4.4 Three main movement corridors have been identified by the Stroud Sustainable Transport Strategy, where integrated packages of initiatives can be delivered, which can "showcase multimodal use with a focus on sustainable travel modes" and underpin the allocation of sites for strategic development in the emerging Local Plan. The strategy recognises that it is important to focus limited resources where the greatest benefits can be achieved. Sharpness is a location which is some significant distance from the main movement corridors and major centres of employment, and it is therefore considered that it cannot provide a sustainable opportunity for development.

- 4.5 The Stroud Sustainable Transport Strategy acknowledges that Sharpness has an issue of “relative remoteness” (page 29), particularly in public transport terms. This is echoed in the Infrastructure Delivery Plan, which goes on to state that this increases demand for private car use. Because of the scale of development, remoteness of the location and likely spread of workplace destinations, the commercial case to provide a relevant bus or coach-based public transport service from Sharpness is questioned by both Gloucestershire County Council, in its role as local highway authority, and Stagecoach, a highly experienced public transport operator.
- 4.6 The Employment Land Review March 2021 (EB30) {paragraph xxi) page 8} does not support the location of Sharpness, for future employment development, instead it states that the best option is land at Grove End Farm, Whitminster {see recommendations paragraph xxiii), page 9 and page 158:

“Although only a Local Plan/SALA Call for Sites submission at this stage, with no detailed masterplanning or agreements amongst the landowners about the nature of delivery, this location does have some advantages over the other New Settlement proposals, at least in terms of employment land deliverability. These include the fact that the land is under the control of an experienced developer who is already active in the area, marketing E/B-Class plots at West of Stonehouse, thus knows the local market and business requirements. The employment land is in a very strong location off Junction 13, M5 allowing it to tap into the two core markets of the District – larger sub-regional/regional requirements on the M5 Corridor and large business growth in Stroud/Stonehouse.”

- 4.7 Page 163 of EB30 compares both sites Sharpness and Grove End Farm.

“PS36: New Settlement at Sharpness – Sharpness is far from isolated from Gloucestershire and Bristol markets, and the proposal for a Knowledge Based business park would benefit from a proximity to GSTP which lacks options to meet the needs of larger technology businesses, both firms expanding from its accommodation and inward investors, particularly manufacturing/logistics firms. In the short-mid term, the Eco Park Proposal, if realised, could meet a lot of this need.”

- 4.8 For the reasons set out in our representations to Policy PS36 and subsequently in response to the Additional Technical Evidence the inclusion of the new settlement/garden community at Sharpness is unsound.
- 4.9 In respect of the new settlement at Wisloe, whilst this is better located – i.e., a more sustainable location, given its proximity to the main movement corridor, it is the scale of the development at the minimum considered in the MHCLG Garden Communities Prospectus that is the issue, and whilst smaller schemes can be considered it does not fulfil the criteria. All proposals must be of sufficient scale to be largely self-sustaining and genuinely mixed use. Secondly, it is the ability of the site to deliver 1,500 dwellings in the plan period, particularly as there is no developer involved.

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?**

- 5.1 The strategy is supported, with the exception of the two new settlements.
- 5.2 Both of the proposed new settlements have objections for different reasons as outline in our representations and briefly above. However, if new settlements/larger scale development is considered as part of the strategy then they need to in suitable locations for development where they can help to meet needs in a sustainable way Paragraph 73 of the NPPF (2021) supports in principle the role of new settlements and significant extensions to existing villages and towns as a means of delivering a large number of dwellings, the key point is that new settlements need to be well located and designed and supported by the necessary infrastructure and facilities including a genuine choice of transport modes (my emphasis).) Paragraph 73 then provides the criteria that should be considered when identifying new settlements. It is clear that the location of Sharpness does not fulfil these criteria.

6. **Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?**

- 6.1 EB4 Topic Paper: The Development Strategy (Oct 2021) sets out the justification for the settlement strategy. It is important that a sufficient amount and variety of land can come forward where it is needed.
- 6.2 Pegasus support the settlement hierarchy is in principle with the exception of Sharpness. Pegasus supports the identification of Stonehouse and Cam and Dursley as Tier 1 settlements in the emerging Plan.
- 6.3 As we have set out in our representations, it is considered that Whitminster has the potential to be higher in the settlement hierarchy than a Tier 3a settlement. Whitminster is well located and accessible and benefits from proximity to higher order settlements. The settlement provides a range of facilities and services, including a primary school, pubs, restaurants, convenience stores, village hall and is served by a regular bus service.
- 6.4 Whitminster is one of the District's larger villages and it is acknowledged in the Settlement Role and Function Study (2018) that ***"there is clear scope to improve accessibility by increasing the frequency and extent of public transport services."*** ***It also states that "...its relative proximity to the larger service-centre settlement of Stonehouse and its location on the A38, a key transport corridor, offers potential to develop better transport links to strategic facilities (including improved walking or cycling connectivity)."***
- 6.5 Whitminster is relatively unconstrained by environmental, topographic or physical obstacles. Given its location and proximity to the M5 it is accessible and attractive to the market. Given the availability of land suitable for development and its facilities and services it has the potential to be a Tier 2 settlement in the emerging local plan.

7. Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?

- 7.1 This is a matter for the Council to justify, but in our opinion, we consider that there are anomalies in the SA in the consideration of reasonable alternatives (this is set out in our representations to PS36 and our comparative assessment of Sharpness and land at Grove End Farm).
- 7.2 Furthermore, it is not clear how the infrastructure evidence has influenced the location of the new settlement at Sharpness.
- 7.3 For example, in response to EB98, the updated traffic modelling continues to underestimate the traffic impacts on the wider highway network from the proposed allocation at Sharpness, and only assesses 2,400 dwellings as opposed to the total number planned of 5,000 dwellings. Further mitigation to that identified in the 'Preferred Highway Mitigation Strategy' would likely be required should the development traffic reductions assumed for sustainable travel from the site not be realised, or the additional housing comprising the total allocation for the site as a whole. It highlights the existing capacity constraints at the two motorway junctions at M5 J12 & M5 J14 and junctions along the A38 corridor, for which significant new infrastructure will be needed to accommodate the planned growth in the Local Plan.
- 7.4 In response to EB108, the STS Addendum does nothing to change our conclusions from our previous representations that the PS36 Sharpness allocation is in an unsustainable location some significant distance from the main movement corridors and major centres of employment. It does not offer a realistic choice of sustainable transport modes; the proposed new rail service cannot be guaranteed and the commercial case to provide a relevant bus or coach-based public transport service is in question. Consequently, development here will encourage travel by car which will have a significantly negative impact on air quality and do little to improve traffic congestion.

8. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?

- 8.1 No comments.

9. Do Core Strategy Policies CP2 and CP4 take a sufficiently strategic approach to clearly define the development strategy for the District as a whole? Should consideration be given to a new policy encompassing the elements of the District wide spatial strategy that are set out in chapter 2 of the Plan, such as the key development strategy headlines?

- 9.1 We have no issue with Policy CP2 per se, in so far as it sets out the strategic growth and development locations. We have however, objected to the proposed new settlements at Sharpness and Wisloe. We have also noted that provision is included for 3,000 dwellings at Whaddon to make a contribution to meeting some of the unmet housing needs of Gloucester City, subject to it being required to meet the needs and providing locating growth at Whaddon is consistent with the approved strategy for the JCS; subject to this being the case this is accepted. However, if the site at Whaddon is not required, this location should not be included to meet Stroud's needs, as such an

approach would result in approximately 5,100 dwellings in the Gloucester fringe meeting Stroud's needs, i.e., 64% of the residual housing requirement as currently proposed (i.e., with Hunts Grove and South of Hardwicke). It is considered that Stroud's needs should be met across the district at the most sustainable locations where it's needs arise.

9.2 A new policy setting out the overall strategy could be included in the plan reflecting the bold text in paragraphs 2.3.4 – 2.3.13. Policy CP3 already sets out the settlement hierarchy but a specific overall strategy policy would assist the effectiveness and implementation of the Plan.

10. Paragraph 23 of the Framework states that broad locations for development should be located on a key diagram. Can the Council clarify whether Map 3 (page 24) in the Plan is the key diagram?

10.1 This is a direct question to the Council.

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?

11.1 No comments

12. Is the use of the term 'cumulative total' in Core Policy CP2 clear? Or does it imply total dwellings for each settlement? Is this consistent with the site allocation policies which uses terms such as 'approximately' when defining dwelling numbers?

12.1 The term "cumulative total" refers to the total number of dwellings proposed in the settlement e.g., for Whitminster there are two sites where PS45 is approximately 10 dwellings and PS46 is up to 40 dwellings, the cumulative total is 50 dwellings or should it read approximately 50 dwellings. The term cumulative when considered with the site allocations may be result in inconsistencies and not necessarily reflective of the policies.

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?**

13.1 No comment.

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

14.1 In summary, the inclusion of two new settlements is not consistent with the Plan's strategic objectives because the new settlement at Sharpness is not a sustainable location and neither can it be made sustainable and deliverable in the plan period and the new settlement at Wisloe is not necessarily deliverable in the plan period.

14.2 The new settlement at Sharpness will not contribute to meeting the overarching strategic objectives and the vision for example, because of its location, it will not promote healthier alternatives to the use of the private car and reduce CO2 emissions by using technologies, active travel and/or smarter choices working towards an integrated transport system. It will not promote a development strategy that reduces the district's carbon footprint, it will not support a pattern of development that prioritises the use of sustainable modes of transport. In which case its inclusion in the Plan is inconsistent with the NPPF paragraph 105 **"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health."** (my emphasis). As explain in our detailed representations on PS36 a new settlement at Sharpness will not be able to support a viable genuine choice of transport modes.

14.3 Development at Sharpness is not well located in respect of the Sustainable Movement Corridor. The Employment Land Review has concluded that land at Grove End Farm, Whitminster "... **would seem to be the strongest of the options. Land here is optioned to a commercial developer who is already active locally, marketing/developing E/BClass plots at SA2: West of Stonehouse, so has existing knowledge of local market conditions. Positioned at Junction 13, M5 it can tap into both the M5 Corridor market and demand for Stonehouse, a centre for both B2/B8 business expansion in the Stonehouse/Stroud Valleys area and for larger E1(g) (i) offices. It would be well placed to meet longer term growth needs if employment land around Great Oldbury is taken up relatively early in the Plan period. Assuming the Eco Park proposal was brought forward, critical mass around Junction 13 would further increase, with the area becoming a centre for advanced manufacturing in Stroud District**". (my emphasis).

14.4 It is considered that Sharpness will not deliver the "exemplar new settlement". The adopted Local Plan (2015) focusses on identifying those settlements that offer the best opportunities for sustainable development, this emphasis on sustainability is continued in the Local Plan Review, however with the climate change agenda becoming a priority issue, there is even more of a focus on sustainable and deliverable development. It is considered that land at Sharpness does not provide that opportunity for an exemplar new settlement, 2,400 dwellings is less likely to achieve significant levels of self-containment.

14.5 We have set out our detailed objection to the proposed new settlement at Sharpness in our reps in particular to the policy PS36 and in respect of how it fails to address the Strategic Objectives of the Plan in our reps to Paragraph 2.3.1 -2.3.25, but also in our



appendices to our representations and in our response to the Additional Technical Evidence consultation in October 2022.

Settlement hierarchy

The Council has produced a Settlement Role and Function Study (2014) (EB71) and an Update (2018) (EB72) to inform the settlement hierarchy and the development strategy. The Plan sets out the settlement hierarchy in Core Policy CP3.

15. 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.

- a. Has the settlement hierarchy been derived using a robust and justified process and is it supported by credible evidence?
- b. 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?

15.1 Pegasus support in principle the settlement hierarchy and concentrating growth in those settlements that already have a range of services and facilities. We object to the new settlement proposed at Sharpness. The evidence does not support the creation of a new sustainable community.

15.2 The settlement hierarchy in some areas does not reflect the role and function of the settlements and reflect the potential given their location e.g. Whitminster has the potential to be higher than a Tier 3a given that it is well located and accessible and benefits from proximity to higher order settlements. The settlement provides a range of facilities and services, including a primary school, pubs, restaurants, convenience stores, village hall and is served by a regular bus service. Bus services in Whitminster on the A48 have recently be improved as a result of the committed development at Great Oldbury, West of Stonehouse (legally binding agreement). This has provided an additional half hourly bus service from Whitminster to Stonehouse and Stroud to the east and Gloucester to the north. (This is addressed further in our response to Matter 6g The Severn Vale Site Allocations.)

15.3 Tier 3a settlements such as Whitminster the ability of the settlement to expand to meet local needs should be recognised as these settlements are relatively sustainable locations for development, offering the best opportunities outside the District's Main Settlements and Local Service Centres for greater self-containment. Alternative wording is proposed in our representations.

15.4 Given the evidence in the SA (CD3) it is not clear what the justification is for Painswick moving from a Tier 3 settlement to a Tier 2 given that the SA states at paragraph 6.87 that it has been identified as having:

“high sensitivity to employment or residential development.”

15.5 Paragraph 1.6 of the Sustainability Appraisal states:

“Much of the land in the eastern portion of the District beyond the more sizeable settlements falls within the Cotswolds Area of Outstanding Natural Beauty (AONB) which has been designated in recognition of its rich, diverse and high quality landscape. Significant areas of land at the Severn Estuary have been designated as a Special Protection Area (SPA), a Special Area of Conservation (SAC) and a Ramsar site and these areas fall partly within the boundaries of the District to the south west. Additional important biodiversity sites in the District include Cotswold Commons and Beechwoods National Nature Reserve (NNR) and Cotswold Beechwoods SAC both of which are in close proximity to Painswick and Rodborough Common SAC immediately to the south of Stroud.”

15.6 An objection is therefore made to the proposal to move Painswick from a Tier 3 to a Tier 2 settlement.

16. **New settlements are proposed within the Plan, at Sharpness and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to ‘anticipated’ local centres within these settlements within Core Policy CP12.**

- a. **Why are these proposed new settlements not in the hierarchy?**
- b. **If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it?**
- c. **How will development proposals at these locations be dealt with where several policies in the Plan refer to the settlement hierarchy in their application?**

16.1 This a matter for the Council to justify.

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?**

17.1 No comments.

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

18.1 This is assessed in the SA and the Topic Papers.

19. **Very small settlements are not included in the hierarchy and instead are considered to be part of the countryside. Is this approach justified?**

19.1 No comments.

20. Settlement development limits (SDL) or boundaries have been identified. Appendix A details proposed changes to some existing SDL on the policies map.

- a. Is it clear how SDL have been defined and are they justified and effective?**
- b. Are the reasons for the proposed changes to the SDL clearly explained? Do they just incorporate completed development into the settlement boundaries? Do any of the proposed changes involve land within the AONB?**
- c. It appears that the SDL proposed changes do not extend to include some committed development sites currently under construction and the proposed site allocations within the Plan. Whilst some explanation has been provided in the Council's response to the representations, we remain concerned that this approach would create policy conflicts for decision-makers when determining future planning applications for these sites, as they would be outside the defined SDL. Can the Council provide more detailed clarification on why they consider their approach is sound?**
- d. Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?**

20.1 No comments.

21. The hierarchy indicates that for Tiers 1, 2 and 3a further development may 'exceptionally' be permitted adjacent to the SDL, subject to meeting other Plan policies. For Tiers 3b and 4 the policy indicates that there could be scope for some or very limited development on land adjoining settlements, to meet specific local needs. Figure 3 in the Plan (pages 56 and 57) lists the types of development that could be permitted adjoining SDL, for each settlement tier.

- a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this? Or will such development be 'exception sites'?**
- b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development would be 'adjacent to settlements', 'edge of settlements', 'adjoining SDL' or 'immediately adjoining'?**
- c. Is the purpose of Figure 3 in the Plan clear? Does it form the supporting text to Core Policy CP3 or does it form part of the policy? Is it clear to developers and decision-makers as to what type and scale of development may be acceptable adjoining the SDL and when the exceptions would apply? How have these been determined and are they justified and consistent with other Plan policies e.g., affordable housing?**

21.1 The matter best addressed by the Council.

22. The text on page 23 of the Plan also states that some limited development on small and medium sites immediately adjoining SDL for tiers 1–3 will be allowed, to meet specific identified local development needs.
- a. What is the status of this text and is it consistent with the policy wording in Core Policy CP3? If not, are any changes necessary to remove any ambiguity and ensure policy effectiveness?

b. Is it clear how local needs will be defined and what will be the criteria for this?

22.1 The is matter best addressed by the Council.

23. Paragraph 2.3.12 of the Plan also sets out support for some development at tier 3b, 4a and 4b settlements of small sites up to 9 dwellings outside of defined settlement limits, provided that the policy is supported by the local community.
- a. Which policy is being referenced here? Is it Core Policy CP3, Delivery Policy DHC2 or some other policy?
 - b. How will the Council determine that the policy is supported by the local community? Will this be at the point of adoption? If so, what is the purpose of this supporting text?

23.1 The is matter best addressed by the Council.

24. Core Policy CP3 does not specify an ‘up to 9 dwellings’ limit, though Delivery Policy DHC2 does.
- a. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? Reference is made to the 9 dwelling limit in Figure 3 but this does not appear to form part of Core Policy CP3. Is this correct?
 - b. In addition Figure 3 also states that for these tiers such development would be ‘not exceeding a 10% cumulative increase in the settlement’s total dwellings during the Plan period’. How will this be assessed and is this approach justified? Should this be included in the policy wording or does Figure 3 form part of the policy?
 - c. How does Core Policy CP3 relate to Delivery Policy DHC2? Are the policies consistent or is there unnecessary duplication and/or unclear requirements?

24.1 The is matter best addressed by the Council.

25. The text on page 23 of the Plan also states that limited housing within the AONB will be supported to meet needs arising from within the AONB.
- a. Is this clearly set out in policy and if so, how will this be assessed by a decision-maker determining future planning applications?



- b. Is this approach consistent with paragraphs 176 and 177 of the Framework in regard to the AONB?**

25.1 The is matter best addressed by the Council.

- 26. Overall, is the settlement hierarchy and how it relates to the development strategy clearly explained within the Plan and is the approach justified, effective and consistent with national policy?**

26.1 For the reasons outlined above and in our representations to the Reg 19 Plan in July 2021 and subsequently in response to the Additional Technical Evidence in October 2022; it is considered that **with the exception of the two new settlements**, the settlement hierarchy and how it relates to the development strategy is justified, effective and consistent with national policy.

Site selection methodology

(Our questions here only relate to the site selection process. Questions on specific site allocations are set out under later matters. Also our questions on site selection to meet gypsy, traveller and travelling showpeople accommodation needs are set out in a later matter.)

The Council's methodology for site assessment and selection is set out within the Strategic Assessment of Land Availability 2016 (SALA) (EB18) and explained in the Topic Paper: Assessment and selection of sites topic paper (EB9).

Chapter 2 of EB9 summarises the site selection process timeline and lists the studies and assessments used to determine the suitability of sites for development along with their availability and achievability.

- 27. Is the site selection methodology justified and does it accord with national planning policy and guidance?**

27.1 We have no issues with the site selection methodology, our objections relate to the outcomes in particular the identification of the two new settlements for the reasons outline in our representations. If new settlements/large urban extensions are included in the strategy, then they need to be located in the most sustainable locations and deliverable.

- 28. Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?**

28.1 This is a matter for the Council and is largely explained in EB9.

- 29. Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?**



29.1 This is a matter for the Council.

30. Overall, has the process robustly identified and assessed all relevant sites?

30.1 See our comments on Matter 5.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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