



Examination of the Stroud District Local Plan Review

**MATTER 2: SPATIAL STRATEGY AND SITE
SELECTION METHDOLOGY**

HEARING STATEMENT

Prepared by Blue Fox Planning Ltd on behalf of:

Persimmon Homes Severn Valley

February 2023

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1. Introduction

- 1.1 This Matter 6 Hearing Statement has been prepared by Blue Fox Planning Ltd on behalf of Persimmon Homes Severn Valley (PHSV). PHSV control the majority of the PS24 and are jointly promoting the site with Robert Hitchins Ltd who control the remaining area. This site is subject to a live planning application.
- 1.2 PSHV also control land allocated for development at 'South of Wickwar Road, Kingswood' (PS38) where a planning application for up to 54 dwellings is live and awaiting determination.
- 1.3 Our comments in response to the Matter 6 questions are prepared in the context of PS24 and PS38.

2. Matter 2: Spatial Strategy and site selection methodology

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?

2.1 We do not have any specific comments or objections to the Vision, however we do note that the Vision is drafted in such a way that it is a narrative on the current context of the district. It does not appear to be forward looking, nor does it detail specific and measurable ambitions. In any event, greater detail is provided within the Strategic Objectives which are theme based and provide an appropriate basis for setting out the aspirations of the Local Plan.

(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?

2.2 CP4 explains that all development “shall accord with the Mini Visions”, yet these visions are not policy and therefore it is unclear how accordance with these mini visions will be assessed. Requiring adherence to the mini visions within CP4 elevates these to policy which is not considered justified as they lack specific and measurable requirements against which compliance can be assessed. Specific policies within the Local Plan implement the objectives of the plan, which give effect to the visions expressed within the document.

SPATIAL STRATEGY

(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?

2.3 The Spatial Strategy seeks to concentrate development at the main towns which is considered an appropriate approach as this provides the greatest opportunities for new development to access services, facilities and employment and where the infrastructure is most capable of accommodating additional growth over the Plan period.

2.4 Alongside exiting main towns the spatial strategy relies upon new settlement locations and within the Sustainability Appraisal (SA) (CD3) it sets out the challenges associated with new settlements compared with expansion to existing settlements. At paragraph 4.68 of the SA it states:

“Directing much of the strategic growth to Tier 1 settlements (Cam and Stonehouse) as well as to the Gloucester fringe area is likely to ensure that most new residents will have a good level of access to existing healthcare facilities and areas of open space, as well as education facilities and cultural facilities. Opportunities to walk or cycle to access services and facilities and employment opportunities are also likely to be greater in those areas. In contrast, strategic growth at new settlements (Sharpness and Wisloe) could leave new residents without immediate access to a wide range of existing services and facilities during the early stages of development. The critical mass provided is likely to support the delivery of new services and facilities as well as the delivery of supporting infrastructure through S016/CIL contributions, which will help to satisfy the needs of residents once the sites are built out. The smaller settlements provide access to a more limited range of services and facilities; however, these locations are only to accommodate a smaller amount of growth over the plan period. Where this development is delivered there is potential for new residents to make use of existing services thereby supporting their viability. As such, mixed effects (significant positive and minor negative) are expected for the policy in relation to SA objectives 2: health and 6: services and facilities. (Our emphasis)

- 2.5 Given the challenges noted within the SA in the delivery of new settlements, it is essential that the Local Plan provides for a sufficiently varied portfolio of sites. In doing so, ensuring continuity and flexibility in housing land supply throughout the Plan period.
- 2.6 Alongside new settlement proposals, the Spatial Strategy proposes extensions to existing settlements and seeks to support the delivery of sustainable patterns of development at lower tier settlements. As a matter of principle such an approach is considered to accord with the NPPF (paragraph 73) which recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Furthermore, the Spatial Strategy proposes more modest levels of development at lower tier settlements which is considered essential in order to sustain such settlements and support housing to meet identified needs (NPPF paragraph 78).
- (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?***
- 2.7 The principle of new settlements has recognition within the NPPF. However, it is essential that the delivery of new settlement locations is based on evidence such that there can be confidence in their ability to deliver at the scale and pace envisaged in the Local Plan.

2.8 Alongside new settlements, the Local Plan should include a portfolio of site sizes to provide flexibility and continuity in supply. It should also maximise, as far as possible the capacity of sites identified as allocated sites, where this can be achieved whilst still supporting wider objectives of the plan, such as environmental protection and enhancements and quality of place-making.

2.9 As per our response to Question Matter 6 (13d) is it essential that the delivery profiles for individual sites identified in the plan are based on the most up to date information, including information provided by developers/land promoters.

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

2.10 PHSV, alongside RHL, control land to be allocated at a main settlement (CAM – PS24) and PHSV also control land at Wooton (PS38), providing both strategic and non-strategic scales of development as part of the Spatial Strategy set out in the Local Plan.

2.11 The spatial strategy does provide for scales of development at specific settlements which is appropriate to their role and function and their ability to accommodate additional growth in a manner which provides for sustainable patterns of development.

(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?

2.12 We provide comments on specific infrastructure requirements as part of our Matter 11 Hearing Statement, but overall, in the context of proposed allocations PS24 and PS38, the scales and location of growth proposed are based on an appropriate level of evidence which supports their inclusion within the plan. We comment specifically on PS24 (and matters of site development capacity responding to extant planning applications); and PS38 within our Matter 6 Hearing Statement, but in the context of the overarching Spatial Strategy the delivery of PS24 and PS38 is informed by site specific policy requirements and other policies within the Local Plan which provide a framework to ensure their delivery in accordance with the Strategic Objectives of the Local Plan.

(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?

2.13 It is considered that CP2, which sets out the spatial distribution of development, alongside CP4 which is concerned with place-making, do provide a strategic approach which adequately defines the Spatial Strategy. It is unclear what added policy value

would arise from additional policies, above that which is already provided for within CP2 and CP4.

(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?

2.14 There is concern that the use of ‘cumulative total’ within CP2 could imply a cap or target which is inconsistent with references within site allocations policies, such as PS24 where it refers to ‘approximately’ 900 dwellings. Within CP2 itself, it references ‘at least’ in the context of additional dwellings over the plan period. Furthermore, Table 2 of the Local Plan refers to the ‘minimum’ residual housing requirement for the district, and Table 3 refers to ‘at least’ for the distribution of housing across the district.

2.15 The reference to ‘cumulative total’ is inconsistent with the approach to housing delivery at specific sites and the global plan-wide housing requirement. As a consequence, there is concern that this inconsistency could artificially constrain development in excess of the allocation figure and prevent opportunities to maximise development where this can be achieved at specific sites without undermining wider policy objectives contained within the plan. The Local Plan should be explicit that the housing requirements, including those for specific sites, are not to be applied as absolute figures.

(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?

2.16 The overall intention is clear, however there is a lack of clarity as to how a proposal is to be assessed in terms of ‘according’ with the mini visions. There also appears differing levels of compliance sought between the mini visions, where development ‘shall accord’, and the guiding principles where development is expected to ‘have regard to’. Policy requirements must be clear and concise and as currently drafted CP4 creates some ambiguity in terms of how compliance is to be assessed, particularly as the mini visions are not drafted as specific policies within the Plan. There must be consistency in the approach recognising their part in delivering an overall forward-looking Vision and associated Local Plan objectives.

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?

- 2.17 CP4 replicates, in summary form, the requirements of policies contained elsewhere within the plan. It represents a generic place-shaping policy, framed as an overarching policy requirement on new development, but the expectation would be that individual policies would form the basis of assessing the suitability of proposed development.
- 2.18 The need for CP4 is questionable on the basis that the requirements included within it are covered elsewhere, therefore its removal would not result in a policy vacuum whereby the requirements would not be set out elsewhere in the Plan.

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

- 2.19 The Council's vision does not include any particular forward-looking objectives and therefore it is difficult to reconcile the Spatial Strategy with the Vision. However, the strategic objectives provide a sound basis upon which the Spatial Strategy has been prepared and from which specific policies, including site allocations, are to be implemented.

SETTLEMENT HIERARCHY

(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?

- 2.20 The Settlement hierarchy gives effect to the implementation of planned development over the Plan period and this is consistent with the evidence base.

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?

- 2.21 As promoters of PS38, PHSV do not support the suggestion that Kingswood should be re-categorised within the settlement hierarchy. Doing so would, in our view, be inconsistent with the analysis set out in the Settlement Role and Function Update Paper (EB72).

- 2.22 Within **EB72**, Kingswood is categorised as a Tier 3 settlement, where the level of growth is to *'provide lesser levels of development.'* As a Tier 3 settlement this means that it is below larger settlements such as Berkeley and Nailsworth, where 'modest' levels of growth are proposed, but above Tier 4 settlements where EB72 concludes that there is *'limited scope for development to meet specific needs'*.
- 2.23 To re-categorise Kingswood to a lower tier would be significantly at odds with assessment undertaken within EB72. EB72 concludes that Kingswood is a relatively sustainable location and *offers very good accessibility to Wootton-Under-Edge and to key services and facilities. (EB72 paragraph 3.37).*
- 2.24 A Transport Assessment submitted with the current live planning application considers the proximity of PS38 to local services and amenities and concludes that provision required on a daily basis are located between 480m and 1km walking and cycling distance from the site. Furthermore, a more extensive range of higher order services and facilities can be accessed within Wotton-under-Edge, approximately 2.5km from PS38.
- 2.25 Moreover, EB72 notes that Kingswood has a strong employment role, with a 1.63 jobs per economically active reside, which is only bettered by Stonehouse. Kingswood is also a net importer of more than 400 workers, as explained in EB72.
- 2.26 Within CP3 Kingswood is categorised as an 'Accessible Settlement with Local Facilities (Tier 3a) and the associated description accurately reflects the assessment undertaken in EB72 and the more detailed assessments which form part of the current planning application.
- 2.27 A re-categorisation to a lower tier (Tier 3b) would not be justified as settlements within this tier are assessed as having a 'poor' range of, and access to, services and facilities. An assessment which does not accurately reflect the role and function of Kingswood.
- 2.28 Kingswood's status is robust. There is therefore no sound basis upon which Kingswood should be re-categorised to a lower tier and to do so would be inconsistent with the spatial strategy which is premised on an assessment of the role and function of individual settlements and would result in an artificial and illogical restriction of development at a settlement which is recognised as having potential to contribute to housing needs.

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

2.29 Our comments relate only to land which is controlled by PHSV, specifically PS24 and PS38. In this context the consideration of site options and the scale of development proposed is informed by appropriate evidence, in terms of the settlement hierarchy and the Sustainability Appraisal. Moreover, the evidence base on infrastructure and transport, as an example, considers the implications of new development at their ‘host’ settlement and, where appropriate and justified, mitigation packages are identified. This represents a sound approach as it aligns housing delivery, against impacts and required mitigation.

(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?

2.30 The settlement hierarchy is considered to accurately reflect the role and function of settlements and in turn the spatial delivery of development over the Plan period. The deliverability of individual sites is a distinct question which forms part of the Examination process. Notwithstanding this, there is clear alignment between the settlement hierarchy and development strategy.

SITE SELECTION METHODOLOGY

(27) Is the site selection methodology justified and does it accord with national planning policy and guidance?

2.31 Our comments are limited to PS24 and PS38, where the process of identifying and appraising site options, aligned with the role and function of individual settlements is supported by an appropriate and justifiable evidence base.

(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?

2.32 Our comments are limited to PS24 and PS38, where the process of identifying and appraising site options, aligned with the role and function of individual settlements is supported by an appropriate and justifiable evidence base.

(30) Overall, has the process robustly identified and assessed all relevant sites

2.33 The site selection process provides an appropriate framework for the identification of sites and the assessment of reasonable alternatives.



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

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SITE SELECTION METHODOLOGY

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(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?

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2.33 The site selection process provides an appropriate framework for the identification of sites and the assessment of reasonable alternatives.