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Local Plan Review

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Dear Sirs

**STROUD DISTRICT LOCAL PLAN REVIEW: ADDITIONAL HOUSING OPTIONS CONSULTATION –
RESPONSE ON BEHALF OF CHARTERHOUSE STRATEGIC LAND**

We are instructed by and write on behalf of Charterhouse Strategic Land (CSL) with respect to the *Stroud District Local Plan Review: Additional Housing Options Consultation* (October 2020).

CSL welcome the opportunity to review and comment on the additional housing options and trust that the important matters set out herein will be given detailed consideration.

Context

CSL has an interest in land at Clattergrove in Painswick. The site is situated in the north of Painswick immediately adjacent to the A46 Cheltenham Road.

Representations

The representations respond to the questions relevant to CSL as set out in the Additional Housing Options consultation document. The response should be read alongside CSL's previous representations concerning the Stroud District Draft Plan for Consultation submitted in January 2020, and the Emerging Strategy Paper submitted in January 2019.

Questions 1 and 2 – Spatial Options: Additional Housing Land

CSL's response is concerned with both the overall housing requirement and with the additional spatial options for its distribution as set out in the following sub-sections.



Overall Housing Requirement

CSL support and welcome the consideration and analysis given to delivery of a larger housing requirement following the publication of the revised standard method to establish the Local Housing Need (LHN) which would increase the minimum level of housing from 638 dpa (as per the 2019 Draft Local Plan) to 786 homes per annum.

It is, in CSL's view, good planning practice to ensure that the draft Plan has tested and evaluated higher levels of housing delivery and that the plan's policies and allocations are sufficient to ensure both flexibility and resilience of the Plan.

The principle of establishing additional housing sites and supply is therefore supported. In short, it is appropriate and necessary to plan for anticipated higher levels of housing growth as the evidence base shows. In planning for such growth there must be headroom above the minimum LHN figure in terms of the actual planned requirement in order to account for non-implementation or delivery delays.

Spatial Options for Growth – Apportionment and Distribution

The Local Plan review has previously set out and tested various spatial options for development. The Local Plan Review Sustainability Appraisal (SA) has assessed four potential growth options (Issues and Options stage of the Plan's preparation) and then subsequently confirmed its recommendations in the SA Report accompanying the Emerging Strategy Local Plan (November 2018).

At that time the SA concluded and recommended a hybrid option combining elements of the four growth options; effectively a 'concentrated development' approach (Option 1) with the inclusion of growth at one / two growth points, smaller towns and larger villages. This hybrid was taken forward through the Local Plan Draft for Consultation (November 2019) and further appraised in the SA Report (November 2019).

The four additional strategic growth options now set out in the Additional Housing Options Consultation (October 2020) consider how an increased housing requirement of 786 dpa might be met.

CSL has reviewed each of the proposed options and concludes that **Option B – Towns and Villages** (subject to an enhanced role and emphasis on Painswick in particular) represents the most appropriate and sustainable approach to directing and apportioning future housing growth in the District.

This conclusion is reached with regard to CSL's previous representations on the Draft Local Plan. Those submissions emphasised the importance of meeting, in full, the identified housing needs of the



District but did not support the apportionment of housing development proposed through the hybrid 'concentrated development' approach.

CSL's objection to the spatial strategy of apportionment was particularly in relation to the over-reliance on emerging strategic locations / sites for housing and conversely a failure in the proposed strategy to adequately support the long-term sustainable development of lower tier settlements (especially Tier 2, Larger Villages, such as Painswick). CSL concluded that there should be an enhanced role and level of development for such Tier 2 settlements to make a critical contribution towards meeting housing delivery requirements and ensuring an effective, deliverable supply of housing land in addition to any contribution arising from strategic growth and sites that would inevitably take longer to implement and deliver.

CSL particularly highlighted concerns as to the insufficient level of future housing growth proposed in Painswick (a single site allocated for up to 20 dwellings) which was concluded to represent a failure to demonstrate commitment to long term sustainability of key services and facilities in this Tier 2 settlement.

The identification of the need for additional housing land supply and the four spatial options set out in the current consultation could provide an opportunity for CSL's concerns over the apportionment and distribution of housing growth to be addressed. Option B (Towns and Villages) in particular offers the ability for the Local Plan to allocate more housing sites and secure greater levels of delivery in Tier 2 and 3a settlements including Painswick.

The other three spatial options (A, C and D) are not supported as they would not effectively address the concentrated growth hybrid model as they either over-emphasise reliance on new growth locations / major development extensions (for which there are very limited realistic opportunities), or reflect too dispersed a strategy (including Tier 4 rural sites) that would be unable to support sustainable development and may be too remote to access services, facilities or employment opportunities.

Option B would provide some further development at higher tier settlements as well as in the smaller Tier 2 and Tier 3 settlements. The scale of such growth should be more focused towards Tier 2 settlements like Painswick which are identified in the Local Plan as having an essential role / function in the provision of services and facilities.

Focus into Painswick and other Tier 2 settlements will support access to and viability of local services and facilities as well as enhancing the potential for contributions arising from new development towards sustainable movement and communications infrastructure. This means such locations can also be



better placed to respond to systemic changes in working practices arising from the effects of the recent Coronavirus pandemic.

Additionally, focus on Painswick as part of Spatial Option B would help demonstrate a commitment to the long term sustainability of key services and facilities in the settlement and the objectives of draft Core Policy DCP1 (Delivering Carbon Neutral By 2030) that seeks, *inter alia*, to locate new development where the form and mix of development or proximity to essential services and facilities minimises the need to travel.

Plainly, the distribution of housing land allocations needs to ensure that there is a sufficient choice and mix of allocated land at sustainable locations (including Painswick) for new housing so that inclusive, balanced, sustainable communities are created.

Question 3 – Reserve Housing Supply

The provision of a pool of reserved sites and land represents an important component in the Local Plan's ability to demonstrate that it is flexible and resilient if housing requirements increase during the plan period or if proposed housing allocations are not delivered at the time or scale anticipated in the housing trajectory.

Identification and then release of reserve housing sites should therefore be a central component in making a sound Plan. Such release of sites can be undertaken without (or in parallel) with an immediate review of the Local Plan. This is especially important as the release of reserved sites that have been allocated, can be undertaken swiftly, while whole or partial plan review is inevitably a lengthy process.

CSL therefore support the principle of identifying reserve sites for housing development in the Plan.

Question 4 and 5 – Strategy Options for Reserve Housing Supply

For the reasons set out above in response to Questions 1 and 2 CSL supports a strategy that identifies additional housing sites now and further reserve housing supply particularly in Tier 2 settlements, including Painswick, which are under-served in the spatial strategy as previously proposed in the Draft Plan.

It is critical that such existing settlements are given the opportunity to secure their longer term futures through planned, sustainable development which reflects their position within the District's settlement hierarchy.



Question 6 – Trigger for a Reserve Site to Come Forward

If the Plan's spatial strategy continues to rely to a significant degree on delivery from larger sites with key new infrastructure requirements then there is, in CSL's view, both a need to keep delivery performance under close review, but also to ensure that there is a mix of other smaller / medium sized sites available to come forward and fill any supply gaps.

The question of what should trigger a reserve site to come forward therefore rests on the performance of housing delivery and completions in the District during the plan period. The NPPF's requirement to ensure a continuous housing land supply of at least five years, coupled with the annual MHCLG Housing Delivery Test (measuring actual, 'on the ground' delivery of new housing) are two critical performance measures that form the basis for triggering the release of reserve housing sites. Delays in allocated sites receiving planning permission and also delays in the discharge / approval of planning conditions, final signature and completion of S106 / S278 agreements or the timely approval of reserved matters are other critical factors and signals that must form part of the set of monitoring triggers for release of reserved sites.

Question 7 – Proposed New Housing Sites

CSL has no specific comments in relation to the identified sites in Berkley, Hardwicke, Beeches Green or Whitminster other than emphasising that growth distributed under Options A, C or D is not supported.

Question 8 – Other Alternative Sites

CSL has previously submitted an alternative development site (known as 'Land at Clattergrove, Painswick') located to the west of the A46 Cheltenham Road in Painswick (SALA reference: **PAI013**) for consideration as part of the Local Plan Review.

A further 'informal' submission was made to the Council in September 2020 concerning an additional area of land connected to the original site. This combined site area both to the west and the east of the A46 in Painswick is now subject to a separate formal submission and supporting information to be provided through the Call for Site process running in parallel with this Local Plan consultation.

Question 9 – Potential Growth Points

Spatial Option C involves the identification of a new 'growth point' in the District. Section 2.2 explains that such a growth point may be located along the main movement corridors within the District.



For the reasons set out above in response to Questions 1 and 2, CSL do not support Spatial Option C and do not therefore support the growth point alternative locations suggested.

Question 11 – Sustainability Appraisal

The findings of the SA analysis concerning each of the four options are noted (summarised in Table 2 at page 9 of the SA Report and with supporting text in paragraphs 1.19 – 1.31). The more detailed justification of the options against each SA objective is also noted.

CSL have some concerns that there is an inherent 'optimism bias' in terms of the high level nature of the SA appraisal of the four options which rests heavily on an approach that considers focusing large levels of development to a small number of large settlements sites to be the most sustainable as they are purported to be able to provide sufficient infrastructure; and that smaller settlements are, conversely, unable to deliver services, infrastructure or access to employment.

This approach in the SA fails to reflect the importance of ensuring that future growth adequately supports rural and smaller settlement vitality and viability reducing the potential for stagnation of these places.

It is also an approach which fails to adequately consider the relative importance or significance of different SA indicators / measures, and fails to consider effectively the magnitude of potential environmental effects arising from development.

Put simply there is a lack of balance as to the importance or magnitude of the various possible effects arising. There is also a lack of acknowledgement, other than very superficially, that the underlying environmental, infrastructure capacity and sustainability conditions are very different across the individual Tier 2 (and other lower tier 3) settlements.

Finally, the SA's optimism bias towards larger settlements inherently rests of the ability of larger new development or growth to provide the necessary infrastructure to ensure it is sustainable. CSL are concerned (as set out in previous representations) that larger scale development often requires the development of costly new infrastructure and that both the lead times and development build-out rates resulting are not, in reality, able to secure the infrastructure necessary or to adequately improve existing facilities. It is therefore why CSL supports a more balanced spatial growth approach that also allows smaller sites in lower tier settlements (such as Painswick) to come forward in the shorter term while



larger-scale developments involving very substantial extensions / new settlements are programmed for longer term growth.

The Plan and the SA therefore need to give closer consideration to this rather than a rather simplistic, superficial and biased analysis that bluntly supports larger settlement growth and a significant reliance on new and expanded infrastructure to mitigate the inevitable environmental effects.

Conclusions

Drawing the above comments and concerns together CSL conclude that:

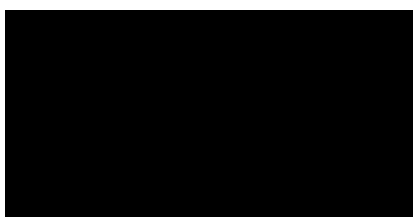
- the increased minimum LHN and therefore the need to increase the District's planned housing requirement is supported in principle. There is a need to ensure that the housing needs of the District are met and therefore the proposed supply of housing sites must exceed the minimum LHN and the supply must include a mix including smaller and medium sized sites which can make an immediate / shorter term contribution to housing land supply;
- Spatial Option B (Towns and Villages) is supported in principle but with the clear concern that Painswick (Tier 2) requires additional housing land allocations (including CSL's land interests) in order to function as a long-term, sustainable and vital settlement. Option B should not result in allocation only to Whitminster and meaningful housing land allocations should be identified in Painswick and other smaller settlements;
- Spatial Options A, C and D are not supported as these either have an over-reliance on major development through urban extensions / new growth point locations or would result in an overly dispersed pattern of development towards very small lower tier (Tier 4) settlements and rural areas;
- reserve housing sites and land should be included within the Local Plan to ensure continuous delivery of housing land supply and provide resilience/flexibility for the Council in addition to any immediate plan review if delivery is falling short of the housing requirements. The trigger points for release of housing sites must include the five year housing land supply position, the District's performance in the annual MHCLG Housing Delivery Test, as well as any evidence concerning delays in the granting or permissions (outline, detailed or reserved matters) and the discharge of conditions or completion of S106 / S278 agreements for allocated sites;



- the SA is considered to provide an analysis of the potential environmental effects of the four spatial options however there is an inherent 'optimism bias' and slant in the way that the options have been assessed including the relative significance, balance and magnitude of effects between each SA indicator and between the four options. The SA approach appears to be too simplistic and its conclusions overly reliant upon the ability of larger settlements and proposed growth points to adequately mitigate effects through the provision of new infrastructure. There is too little weight/balance in the SA analysis towards the importance of supporting growth in smaller settlements (including Painswick) and for rural sustainability.

We would be grateful if you will confirm safe receipt of this representation and that it has been duly made.

Yours sincerely,



For and on behalf of Charterhouse Strategic Land