

**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW
EXAMINATION IN PUBLIC (EiP)**

**MATTER 2 | SPATIAL, STRATEGY AND SITE SELECTION
METHODOLOGY**

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REPORT CONTROL

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1.0 MATTER 2: SPATIAL STRATEGY AND SITE SELECTION METHODOLOGY

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

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?

- 1.1 As our previous representations have set out, we do not consider that the plan puts forward a positive vision for the Wotton Cluster, which is provided with very little development and no way of meeting the affordable housing needs of Wotton-under-Edge in particular, which is one of the five largest settlements in the district.
- 1.2 The unmet need in Wotton stood at 237 applicants in December 2020, we are seeking updated figures but with no stagnant development having come forward in this cluster since that point it is unlikely this level of need has significantly reduced. An allocation of just 50 dwellings in total is not a positive response to addressing the problem.
- 1.3 The vision diagram (Map 4) sets out that for this area the vision is “...*improving access to jobs, services and facilities in the south of the District, to boost local sustainability and community vitality*”. However, key to community vitality is providing sufficient homes, in particular affordable homes. Having no sizeable allocations in this entire area (just one allocation of 50 units) can hardly be seen as a positive and realistic vision – nor does it meet SO1.
- 1.4 This vision also takes a blanket view of the whole cluster, assuming that in all parts of the locality, out-commuting is a problem. However, Kingswood is an area with a much higher number of jobs compared to residents (see table 3 of our December 2020 representations) and the proposed allocation to the west of the existing Renishaw campus (PS47) will boost the number of jobs in the area significantly.
- 1.5 In our view the vision and proposals for the Wotton cluster are not justified as they make no effort to address affordable housing need and provide housing in an area (i.e. Kingswood) where the jobs to economically active residents ratios are high.

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?

- 1.6 We do not consider that the spatial strategy is wholly justified due to the absence of proposed growth to meet the needs of the Wotton Cluster, it is also not positively prepared in regard to meeting these needs.
- 1.7 The selection of Sharpness New Settlement in particular is not sustainable because there is no costed plan to deliver this development with its essential supporting infrastructure (bus services, rail upgrades, schools etc.) in its earliest phases, with no concrete commitment to the delivery of significant rail and bus improvements at all – without which it will be almost completely car dependant as a development. It is therefore not been demonstrated that this part of the strategy is effective as there is no evidence to suggest it is financially deliverable during the plan period.
- 1.8 We have not seen a clear reasoning as to why this approach was selected over alternatives, such as that which would provide a broader range of smaller more deliverable sites in more sustainable locations, such as within the Wotton Cluster, or a new growth point in a less remote and more sustainable location, such as at Whitminster.
- 1.9 We also have concerns about the spatial strategy’s overreliance on very large strategic sites, particularly unsustainable new settlements that skew what would be a reasonable allowance on strategic sites to an unrealistic level.

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?

- 1.10 Our previously representations have focused significantly on this issue, identifying that the council is providing 76% of the housing supply that the local plan will provide, which also includes windfalls (so the percentage of planned supply is even greater), in a handful of strategic sites. The latest Topic Paper EB8 confirms that 8,080 dwellings out of the 9,065 are located on strategic sites, equating to 89% of the overall supply. These concerns are also exacerbated by the inclusion of two standalone new settlements (which provide nearly 50% of the strategic site supply), the delivery of which is not underpinned by firm evidence to prove they are deliverable. One of these sites, Wisloe, is not even being promoted by a developer.

- 1.11 In a similar way to Sharpness being without precedent in terms of a remote location for a new Garden Community, such an overreliance on strategic sites is also without precedent and our representations have demonstrated that by comparing the proportion of strategic sites to that adopted in other plans in the region.
- 1.12 Such overreliance is not only unjustified, but it will also not be effective. In our matters statements and representations in respect to Wisloe and Sharpness we have highlighted the data (Lichfield's 'Start to Finish' paper) that shows how long it takes to deliver housing on these sites from the point of an application being validated. Planning applications for both sites, where no specific public consultation has been undertaken, or pre-application submission has been made, is a distant prospect and therefore so are housing completions. We have noted the effect that applying even an optimistic approach to when completions may start on these sites means that at least 1,065 will not come forward within the plan period, likely far more.
- 1.13 This clearly fails the tests of soundness in respect to the plan being effective, because to simply plough on with these sites and the assumptions made about them will not deliver the housing that the plan aims to provide, within the plan period.

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

- 1.14 Wotton-under-Edge is a settlement of significant scale which exhibits characteristics of a Tier 1 settlement – as the council's own Settlement Role and Function Study (2018) testifies (see paragraphs 5.1-5.4 of our December 2020 evidence).
- 1.15 The inadequate level of development proposed in the Wotton Cluster means that in our view the strategy for development that the Plan sets out is inconsistent with this hierarchy.

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?

- 1.16 No, we do not believe the SA supports the location of development proposed. The SA clearly sets out that the most sustainable option was number 1 which relates to the concentration of development at existing settlements.

- 1.17 The council then concludes that whilst that was the most sustainable option in SA terms, it was not practical as there was insufficient land in these locations to meet the District's housing need over the plan period. We don't disagree with that conclusion, but we question the next step taken in terms of selecting a 'blended' spatial strategy.
- 1.18 The council then selected a 'blended' approach to the strategy by selecting both the concentrated development, and new growth point options.
- 1.19 In taking that approach it would have been rational to look at new growth points that lie as close as possible to the locations that Option 1 suggested were the most sustainable locations for development (i.e. the main population clusters). The selection of Sharpness New Settlement clearly does not meet that by placing a very large amount of development in one of the most peripheral locations possible in the district, well divorced from the existing population centres that were considered to be the most sustainable locations for development, and where housing needs are arising.
- 1.20 In our view such an approach is unsound as the SA process should have influenced the spatial strategy and a more suitably located new growth point, such as Whitminster, chosen alongside a greater concentration at settlements that are currently under provided for – such as within the Wotton Cluster.

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?

- 1.21 As set out above, the lack of significant development to support Wotton-under-Edge's town centre, and the wider cluster, will not assist its long term viability, nor will matching housing development be available to support the employment allocation proposed as part of policy PS47 – if there are no suitable and affordable housing near to these new jobs then achieving self-containment is a remote possibility.

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?

- 1.22 The term 'minimum' would be more appropriate, otherwise there is a risk that developers prefer to put larger houses on sites, reducing yield but still complying with the 'approximately' caveat. In that scenario the Plan would fail to deliver the required quantum of housing growth.

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

- 1.23 We do not consider that the vision and strategic objectives will be met by the current strategy. For example it will not meet the housing needs of the Wotton Cluster, thereby failing to meet SO1, it provides no support to the town centre of Wotton via new development and thereby fails SO3, and the proposal to locate a very large amount of development in unsustainable locations where the reliance on the private car will be unavoidable and CO2 emissions will not be minimised, fails to meet SO4.

15b. 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?

- 1.24 As our representation have explained (see summary at paragraph 5.24 of our December 2020 representations) the council's own evidence confirms that Kingswood outperforms many other settlements that are higher up in the settlement hierarchy in terms of accessibility (such as Nailsworth and Minchinhampton). It is also very closely linked to Wotton-under-Edge which is within walking distance and is a Tier 2 settlement, although exhibiting Tier 1 characteristics as the council's own evidence base suggests – in our view the hierarchy should reflect this close linkage and the settlements should be linked and classed as a Tier 2 settlement together.
- 1.25 Therefore, we do not consider that the hierarchy as currently set out in policy CP3 is justified as it does not reflect the available evidence. We would suggest an appropriate amendment would be to designate Wotton-under-Edge/Kingswood together within Tier 2, or alternatively move Wotton to Tier 1 and Kingswood to Tier 2.

21a. 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'?

- 1.26 We strongly support the need to allocate sites to deal with unmet affordable need, rather than leave it to the interpretation of policy on a site-by-site basis. As we have set out additional sites are needed to address this issue in the Wotton Cluster.

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?

1.27 We fully support the need to plan for housing needs arising from communities located in the AONB. However, where potential sites are constrained by the AONB designation, in order to comply with paragraphs 176 and 177 we consider alternatives outside of the AONB, but where they meet the need of a settlement within it, should be given priority.

1.28 An example of this is the functional relationship between Wotton-under-Edge and Kingswood. Here the settlements lie in very close proximity to one another and rely on facilities within each other's area (for example the secondary school serving Wotton lies adjacent to Kingswood, and Renishaw just to the north of the village provides a large employment hub in the area). Kingswood is not constrained by the AONB designation and is located within easy walking and cycling distance of many parts of Wotton, therefore development here could accommodate the housing needs arising from Wotton in a sustainable way that avoids development in sensitive parts of the AONB, rather than these housing needs being ignored which is the current approach of SDC.

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?

1.29 For the reasons we have explored we do not consider that the development strategy and settlement hierarchy is sound because it provides for a very large proportion of the council's housing supply in new settlements that are inappropriately located and also not underpinned by evidence to prove they are in fact deliverable. It fails to take into account the council's own evidence and meet housing needs in a sustainable manner as it has paid little heed to the SA process in respect to the designation in locational terms of the new settlements.

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?

1.30 Our representations raised a number of inaccuracies in the SA testing in respect of specific sites such as land at Kingswood, these concerns have never been remedied. Please refer to our hearing Statements for Matter 1 for further detail.

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

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?

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

1.31 As part of our matter 1 statement (paras 1.5-1.11) we have raised a number of concerns regarding these questions. We won't repeat these in detail but in summary the concerns relate to the fact that additional evidence submitted as part of the various plan stages does not seem to have been reviewed, and sites reassessed in light of updated evidence supplied. There is no evidence to suggest that the evidence base provided by others has been kept under review to see if the SA process has been affected by such additional information.

1.32 This means that the site selection process has not been iterative and has simply sought to stick to the originally determined strategy in respect to smaller sites in particular.



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