

Part B – Please use a separate sheet for each representation

Name or Organisation: Vistry Group

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="x"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

CORE POLICY CP3 – Settlement Hierarchy

Draft Policy CP3 categorises settlements into the following tiers:

- Tier 1 – Main settlements
- Tier 2 – Local Service Centres
- Tier 3a – Accessible settlements with local facilities
- Tier 3b – Settlements with local facilities
- Tier 4a – Accessible settlements with basic facilities

Tier 4b – Settlements with basic facilities

The classification of settlements into different tiers depending on their size, transport infrastructure and levels of facilities and services is generally a useful tool in determining the most suitable and sustainable location for new development.

However, the tiering system, and the designation of Kingswood as a tier 3a settlement has failed to recognise the relationship between Kingswood and the “tier 2” settlement of Wotton-under-Edge and the number of facilities and services available within Kingswood which make it more appropriately allocated as a Tier 2 settlement.

One of the criteria used to determine the settlement hierarchy is access to Strategic Level Services. Four strategic level services which have been attributed to Wotton Under Edge (A secondary School, sixth form, sports centre and swimming pool) are all within 500m of Kingswood. The Settlement Role and Function Study (2018) shows that Kingswood has ‘very good’ overall accessibility and benefits from better access to strategic level services than a number of Tier 2 settlements and levels of accessibility comparable to Wotton Under Edge. The Study also notes Kingswood is a significant provider of jobs and significant importer of workers (Table 7: Summary of employment role and function, Settlement Role and Function Study, 2018)

The undervaluing of Kingswood as a sustainable settlement and the failure of the settlement hierarchy to acknowledge the links between Wotton Under Edge and Kingswood has a significant impact on the development strategy and the soundness of the plan in general.

The purpose of Core Policy CP3 and the designation of settlements into a hierarchy is intended to ensure that development is directed to the most sustainable settlements. As a result therefore, Wotton-under-Edge, as a Tier 2 settlement, and the largest settlement within the Wotton Cluster, would be expected to be a focus for new development. However, due to its physical constraints, no development is proposed for the settlement. This is acknowledged within the Settlement Role and Function Paper. The Paper states in relation to Wotton Under Edge:

"Growth should be prioritised towards the District's larger and better-resourced settlements. As one of the District's main towns, Wotton-under-Edge should be a priority location. However, the town faces significant environmental, physical and topographic constraints, which make significant expansion difficult.

Wotton-under-Edge's relatively balanced population and healthy ratio of working-age residents is positive in terms of sustaining the settlement's services and facilities. But having experienced relatively low housing growth since 2011, given its size and functionality, (and with no significant development currently anticipated), Wotton may benefit from some planned development, targeted and scaled to meet local housing needs."

The failure to acknowledge the link between Kingswood and Wotton-under-Edge in the plan means that the only very limited number of housing is proposed for the whole of the Wotton Cluster which leads to an imbalance in planned housing provision across the plan area.

The plan highlights a number of key issues facing the Wotton Cluster which includes:

- *Ensuring adequate provision of affordable housing and opportunities for downsizing for local people*
- *Preventing the loss of employment sites to housing, providing for low skilled job opportunities*
- *Maintaining and improving vitality of Wotton High Street*

(paragraph 3.7.4, Pre-submission draft Local Plan)

None of the above issues are capable of being addressed with a stagnant or limited growth in the population within the Wotton Cluster (which is currently planned) within the plan period.

Housing for South Gloucestershire and the Duty to Co-operate

The proximity to the South Gloucestershire boundary also needs to be taken into account. Whilst it is acknowledged that the West of England Authorities have agreed to address their housing need within their plan area, it must be acknowledged that the Wider Bristol Housing Market area extends in to the southern part of Stroud District (SoCG, WoE and Stroud District Council, October 2018) and there will therefore be a pressure on housing in this location.

The Statement of Common Ground (SOCG) between Stroud District Council and the West of England Councils dates from October 2018. It states that:

Notwithstanding the requirement for SDC to meet its own housing requirement provision and the significant constraints within SDC, SDC is willing to work with the WoE Councils to understand the nature of any potential shortfall should this arise through the JSP Examination, and to discuss whether there is any scope for a revised growth and investment strategy to the north of the JSP area.

There has been no update to the SOCG or any evidence of any further dialogue since 2018 with any of the WoE Council's following the withdrawal of the West of England Joint Spatial Plan (JSP) and now the preparation of a Spatial Development Strategy between Bath and North East Somerset, Bristol and South Gloucestershire. Given the significant changes in circumstances it is essential that Stroud continue engagement with these authorities as part of its Duty to Cooperate to ensure a sound plan.

Kingswood -A Suitable location for Additional Housing Development

Policy CP3 states that the scope for future growth at Tier 3 settlements is constrained. This is simply not the case at Kingswood.

Kingswood has the potential to provide additional housing allocations which, due to its proximity and shared facilities and services can help meet the needs of Wotton-under-Edge in scale with its role as a tier 2 settlement and the principal settlement in the Wotton Cluster.

The Settlement Role and Function Study 2018 concludes in relation to Kingswood:

Kingswood is relatively unconstrained by its environment and topography.

In accessibility terms, Kingswood offers a relatively sustainable location for potential growth and development, despite its lower tier status. It benefits from

proximity to the larger service-centre settlement of Wotton-under-Edge and very good accessibility to key services and facilities.

Kingswood should be redesignated as a tier 2 settlement, or at the very least, the connection between Kingwood and Wotton-under-Edge needs to be recognised and the reference within the Draft Local plan 2019 to tier 3a settlements helping to meet housing needs of more constrained tier 1 or tier 2 settlements reinstated.

Tiering of New Settlements/Strategic Allocations

The Council's approach to the classification of the proposed new settlements/strategic allocations is not clear or consistent and has not been appropriately justified. This is particularly apparent in relation to Hunts Grove and Sharpness.

CP3 states that Hunts Grove is "anticipated" to be a Tier 2 Local Service Centre, that is despite it being an extension to the south of Gloucester rather than a settlement in its own right. It is not a market town or a large village (as Tier 2 settlements are described) and the purpose of including it as a Tier 2 settlement is not clear, other than to justify the further extension of it as proposed in policy CP2. However, other more established settlements (such as Kingswood) would be far more justifiable as Tier 2 settlements and therefore appropriate for further development.

Sharpness is designated as a Tier 3a settlement. This is based on its current level of development. However, the Council's approach to Hunts Grove would suggest that the proposed new settlement would fall into a different category. Its location in Tier 3a suggests that scope for future Growth is constrained, which calls into question the appropriateness and deliverability of the new settlement in this location.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The designation of Kingswood as a Tier 3a settlement without a statement within the policy to say that Tier 3 settlements can help meet the needs of more constrained Tier 1 and Tier 2 settlements is not sound as it not justified and will render the plan ineffective. There will be an insufficient distribution of housing across the plan area and the plan will fail to meet the issues and top priorities for the Wotton cluster recognised within the plan.

To make the plan sound, Core Policy CP3 should be amended to either:

- Include Kingswood as a Tier 2 settlement, recognising its shared facilities with Wotton-under-Edge, or (as a minimum), or
- Recognise the connection between Kingwood and Wotton-under-Edge, and the inability of Wotton-under-edge to deliver an appropriate amount of

housing and reinstate the reference within the Draft Local plan 2019 to Tier 3a settlements helping to meet housing needs of more constrained Tier 1 or Tier 2 settlements.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It will be necessary to participate in the hearing sessions as there are a number of important points to raise which may need to be addressed individually. It may be necessary to respond to any points raised by the Local Authority and we may need to be available to answer any questions on these representations which the Inspector may wish to raise.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:21/07/21