

**STROUD DISTRICT COUNCIL LOCAL PLAN REVIEW  
EXAMINATION**

**MATTER 1 | COMPLIANCE WITH STATUTORY  
PROCEDURES AND LEGAL MATTERS**

**Grass Roots Planning on behalf of Redrow Homes Ltd**

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## REPORT CONTROL

Project:	Charfield Road, Kingswood
Report Type:	Hearing Statement
Client:	Redrow Homes Ltd
Our Reference:	603/A3
Date:	13 <sup>th</sup> February 2023
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## 1.0 INTRODUCTION

- 1.1 On behalf of Redrow Homes (SW) Grass Roots Planning have been instructed to make various representations to the emerging Local Plan for the District and specifically promote two sites in Stroud. These are land north of Charfield Road, Kingswood and land north of Hyde Lane, Whitminster. Redrow also have an interest in Strategic Site Allocation G1: Land to the South of Hardwicke; separate representations have been prepared in respect of that site by Carney Sweeney.
- 1.2 Our involvement in these sites stretches back to 2020 when we made representations to the Council's 'Additional Housing Options' consultation. We have set out our representations as part of the previous consultation stages to the Local Plan; these represent our position on the plan and its constituent parts, but this statement seeks to elaborate on the issues and concerns we have raised and also responds to the Inspector's Matters, Issues and Questions (MIQs) set out in the December 2022 note.
- 1.3 This statement relates to Matter 1 which refers to compliance with statutory procedures and legal matters.

### **Issue 1.2 | Has the Plan been prepared in accordance with other legal and procedural requirements?**

5. Have unreasonable alternatives been appropriately considered and have adequate reasons been given as to why these have not been selected?

- 1.4 As set out in paragraph 1.9 of our representations submitted to the pre-submission consultation (July 2021), we have concerns regarding a lack of iterative process undertaken by the Council in respect to reasonable alternatives.
- 1.5 This is in particular relation to land north of Charfield Road, Kingswood where additional technical evidence has been provided but appears to have largely been ignored by the Council. In summary, the site was originally submitted in the 2017 Strategic Assessment of Land Availability (SALA) and given the reference KIN008. A smaller parcel of land, which formed part of the wider site, was also put forward in 2019 and given the reference of KIN013. In 2018, the site was dismissed on landscape grounds.
- 1.6 In December 2020, as part of the Additional Housing Options Consultation, we submitted a swathe of evidence on behalf of Redrow Homes including a vision document, landscape

strategy, flood risk scoping report, preliminary ecological appraisal, odour report and school capacity report in support of our representations.

- 1.7 Whilst we acknowledge that the reversal in national government policy meant that SDC no longer had to consider additional housing land, in our view, this would have been a reasonable time to re-assess alternative sites and additional evidence submitted, which would have allowed a revised assessment to be undertaken. In our view, this has not been undertaken – for example the table including within the SA does not even reference the Additional Housing Options consultation paper:

Land north of Charfield Road	KIN008		Yes	No	No	No	<p><b>Pre-submission Draft Local Plan Stage:</b> As above</p> <p><b>Emerging Strategy Paper Stage:</b> The land is not suitable for development because of the high landscape sensitivity of the site. Development would significantly extend the settlement form into the open vale countryside on higher ground and is inappropriate within the wider landscape. The potential impact would therefore prevent sustainable development in this location.</p> <p><b>Draft Local Plan Stage:</b> As above</p> <p><b>Pre-submission Draft Local Plan Stage:</b> As above</p>
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Figure 1. Table A9.2 of the SA (CD3b), simply stating ‘as above’ and failing to acknowledge additional evidence

- 1.8 This is further reinforced in particular within Appendix 5 and paragraph A5.2 of the SA (CD3b) which states the following in respect to alternative sites:

*A5.2 This work was originally presented in an internal SA note to Stroud District Council officers in **early August 2018**, so that the findings could be taken into account to inform the selection of potential sites for inclusion in the Local Plan Review Emerging Strategy Paper. However, some additional site options have been appraised following their promotion as part of the 2019 Site Submissions which was undertaken as part of the SALA. The appraisal of these sites at this stage also included some which were submitted previously but were then considered for an alternative use. These sites are presented in a separate summary table (Table A5.6) so that they can be easily identified from the other site options considered. **(our emphasis)***

- 1.9 However, representors did not have sight of this information until May 2021 and as part of our representations to the Pre-Submission Local Plan in July 2021, we reviewed the SA score for land north of Charfield Road, Kingswood and found elements of the results to be incorrect – please refer to paragraphs 5.11 – 5.15 of our representations on this matter.
- 1.10 Since the submission of the plan, the Council has not produced any further documentation which shows that these additional sites have been considered again since they were initially discounted many years ago. It is not referenced within the additional housing options consultation report.
- 1.11 Based on the above statement in the SA therefore (that SA alternative sites were issued to officers in August 2018), the fact that there has been no acknowledgement of the additional

technical evidence submitted and nor has there been any correction to the SA which may have allowed a different score to be achieved when compared to alternative options for development, in our view there has not been a sufficient iterative process to which reasonable alternatives have been assessed to the same level as preferred options, which is a requirement of the SA process and the NPPF.

6. Is it clear how the SA has informed judgements about future growth within the Plan and the choice of spatial strategy? Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the Plan?

1.12 SDC set out that their spatial strategy is the following:

*“The final development strategy set out within the Pre-Submission Draft Local Plan (May 2021) is therefore, in summary, a hybrid strategy based primarily upon the principle of concentrated growth at a selection of strategic urban extensions, new settlements and commercial market areas, but with some dispersal to ensure local needs can be met and settlements can respond to wider economic and demographic challenges.”*

1.13 However, in our view, this is not reflective of what has actually been proposed within these areas, when one looks at the distribution of housing across the authority area against the different settlements within various tiers of the settlement hierarchy:

Tier 1 Settlements	No of Dwellings Proposed
Cam and Dursley	1,090
Stonehouse	710
Stroud	165
<b>Total</b>	<b>1,956</b>

Tier 2 Settlements	No of Dwellings Proposed
Berkeley	170
Minchinhampton	80
Nailsworth	90
Painswick	20
Hunts Grove	750
<b>Total</b>	<b>1,110</b>

Tier 3a Settlements	No of Dwellings Proposed
Hardwicke	1,350
Brimscombe & Thrupp	190
Leonard Stanley	40

Frampton on Severn	30
Newton & Sharpness	70
Kingswood	50
Whitminster	50
<b>Total</b>	<b>1,790</b>

New Settlements	No of Dwellings Proposed
Sharpness	2,400
Wisloe	1,500
<b>Total</b>	<b>3,900</b>

**Table 1. Distribution of Development against the settlement hierarchy**

- 1.14 The majority of development is being directed towards new settlements, rather than Tier 1, even if Hardwicke’s functional location in the Gloucester Fringe, and therefore appropriate in strategy terms, is taken into account. In our view, this selection of sites is not reflective of what the SA was trying to achieve – i.e. locating growth in the largest settlements first (i.e. ‘Option 1 – Concentrated Growth’), following by new settlements (which in our view, as discussed in our Matter 2 Hearing Statement, should be located adjacent to existing settlements in any event to synergise with their existing services and facilities).
- 1.15 Instead what has occurred is a dispersed approach to development which actually allocates site in settlements which are far less sustainable than other options available to the Council and which can contribute and create to infrastructure requirements.
- 1.16 In our view, consideration should be given to dedicating further land for development within Tier 1 and 2 settlements (of which we consider Wotton-under-Edge and Kingswood should form part of – please see our Matter 2 statement) and inappropriate sites, such as Sharpness and Wisloe, removed from the list of allocations, for the reasons we have discussed.
- 1.17 In particular relation to Sharpness, we note Topic Paper EB4 also states the following:

*“However, there are still some significant negative effects identified for this option, in particular on landscape and biodiversity. This option would include the new growth point by Sharpness, where potential impacts on the Severn Estuary international designations may result and also development within a number of settlements in the east of the district which lie within or in close proximity to the Cotswolds AONB including Minchinhampton, Nailsworth, Painswick and Brimscombe and Thrupp. There is also potential for higher numbers of residents to potentially be affected by flood risk and impacts on water quality relating to the Severn Estuary designations.”*

1.18 The Council have commented in respect that adjustments have been made to the policy wording to ensure the above effects will not occur – however, in respect to Sharpness and the evidence presented by the promoters in relation to this site, there is a significant lack of information provided which fails to demonstrate how the site would avoid an adverse impact on international designations such as the Severn Estuary. This a significant and serious concern; in our opinion, the SA clearly indicates that changes should be made to the Plan to remove this site.



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