

# EXAMINATION OF THE STROUD DISTRICT LOCAL PLAN REVIEW

## INSPECTORS' MATTERS, ISSUES AND QUESTIONS

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**Representation Reference 415**

**Land Adjoining the Southern Boundary of Fieldway Upon St Leonards**

**R D Brogden MRICS of Bruton Knowles**

### **Matter 2 Spatial Strategy and site selection methodology**

***Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?***

*(Please note that these questions relate to the overall spatial strategy and the site selection methodology. Further questions on unmet needs and specific site allocation are set out under later matters.)*

### **Settlement hierarchy**

The Council has produced a Settlement Role and Function Study (2014) (EB71) and an Update (2018) (EB72) to inform the settlement hierarchy and the development strategy. The Plan sets out the settlement hierarchy in Core Policy CP3.

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?

*Response:*

*There is no clear documentation that the hierarchy has been established using objectively assessed criteria. We have previously set out our opinion as to why Upton St Leonards should be re classified – see letter 18/7/2021. However in addition to that we comment that whilst reference is made by SDC to a number of factors there is no clarity as to the weighting attached nor how it is influenced by character, culture and environmental constraints.*

*Previous development appears to elevate the hierarchy status but for no apparent reason.*

*It appears that proximity to Gloucester [as opposed to say Stroud] is a demerit but without any justification or explanation.*

*A review of Table 8 of the Stroud District; Settlement and Function Study Update 2018 does not assist the reader in understanding why or how certain settlements are categorised as 3a yet Upton St Leonards is not.*

- 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?

*Response:*

*We would add to the above list Upton St Leonards should be Category 3a.*

*See above comments but in short there appears to be a wholly subjective approach to settlement hierarchy; no scoring system has been employed and no clarity as to the weighting applied to the headings or comments.*

6/2/2023