



# **Kingswood Parish Council Hearing Statement**

**Stroud Local Plan Examination**

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

**February 2023**

***This Hearing Statement is prepared and submitted on behalf of Kingswood Parish Council (KPC).***

**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.)**

### Vision and objectives

**Q1. Does the Plan set out a suitably positive and realistic vision for the future development of the District as a whole?**

#### **KPC Response:**

1. Please see our response below regarding the Wotton Cluster which demonstrates that the ‘Mini Visions’ are not realistic and therefore the Vision for the district as a whole is not realistic given that it is comprised of the 8 areas.

**Q2. 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?**

#### **KPC Response:**

2. The ‘Mini Vision’ and corresponding Map (Map 11) for the Wotton Cluster is not justified as we set out throughout our representations. The Mini Vision confirms and illustrates the poor sustainability of the Council’s proposed approach to the Wotton Cluster whereby the settlement of Wotton under Edge is a Tier 2 centre as a focus for strategic services and facilities, yet Kingwood is a Tier 3a settlement lower down the hierarchy, yet the housing growth is proposed for Kingswood rather than Wotton Under Edge.
3. It states as its Vision *“to boost local sustainability and community vitality”* yet the proposed development strategy will make the area less sustainable and vital as locating new housing growth at Kingswood where there are very limited services will make travelling by car to Wotton under Edge a necessity for schools and services.
4. The Vision states that *“to improve public transport access to those services that cannot be met locally”*. This is simply a statement and is not justified as there are no concrete plans to improve the poor bus services between Kingswood and Wotton under Edge which currently consists of the 60 bus service which stops outside of Katharine Lady Berkeley’s School – a 0.5 mile walk from the centre of Kingswood. This bus service currently runs every two hours between 6am – 6pm Monday – Saturday. The 85 and 86 bus lines are currently threatened with closure.

**Q3. Have the seven strategic objectives (S01, S01a and S02-S06), included in Chapter 2 of the Plan, been positively prepared, are they justified and are they consistent with the overall vision and the priority issues facing the District?**

**KPC Response:**

5. The strategic objectives are in direct conflict with the strategy the Council is proposing for the Wotton Cluster. We briefly outline this below:

**S01 Accessible Communities:** The accessibility to services and amenities will not be improved by locating housing growth in Kingswood where there are few services and amenities including that of school capacity as we set out in our various submissions.

**S01a Healthy, inclusive and safe communities:** The strategy for the Wotton Cluster will result in more driving and force those who cannot drive to walk or cycle on unsafe routes from Kingswood to Wotton under Edge.

**S04 Transport and travel:** Whilst the Council's aspirations for promoting healthier alternatives to the use of the private car, reducing CO2 emissions, more active travel and a more integrated transport system are commendable, they are not based in reality and not deliverable and the proposed development strategy is in direct conflict with this objective.

**S05 Climate Change and environmental limits:** This objective seeks to reduce the District's carbon footprint, adapt to climate change and respect environmental limits. One of the ways it seeks to do this is by "Supporting a pattern of development that prioritises the use of sustainable modes of transport". The strategy for the Wotton Cluster is in direct conflict as set out above.

6. We also note a distinct lack of reference to the importance of biodiversity / wildlife in the District in the Strategic Objectives.

### **Spatial strategy**

The Framework states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (paragraph 20). Chapter 2 of the Plan sets out the Development Strategy and a number of ‘development strategy headlines’ are also set out in text (page 23).

The Plan identifies, in the supporting text for Core Policy CP2, that the objectively assessed needs of the District for the period 2020-2040 will be met through a strategy which concentrates most development at a series of strategic sites to be ‘located at the principal settlements within the District, at new settlements and within the key employment property market areas...’. Smaller scale development is expected to come forward in accordance with the settlement hierarchy. However, the policy mainly just lists the proposed strategic growth and development locations.

Core Policy CP4 is described as ‘Making Places: a Spatial Vision for Stroud District’. It sets out a number of development principles which appear to be covered by other policies within the Plan.

**Q4. 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?**

#### **KPC Response:**

7. As we have set out above, the spatial strategy for the Wotton Cluster is not justified and does not promote a sustainable pattern of development.

**Q6. Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?**

#### **KPC Response:**

8. The strategy is clearly not consistent with the settlement hierarchy.
9. Apart from Cam the other three Tier 1 settlements (Main Settlements) are delivering **1,265 dwellings** with only **185 dwellings** planned in these settlements apart from the strategic sites at Cam.
10. Tier 2 settlements (Local Service Centres) are delivering **1,110 dwellings** with **750 dwellings** coming from the Hunts Grove Extension. **Wotton Under Edge is the only Tier 1 or 2 settlement with no additional housing in the Local Plan.**
11. Tier 3a settlements (Accessible Settlements with Local Facilities) settlements are delivering **1,790 dwellings** which is considerably more than either Tier 1 or Tier 2 settlements.

**Q7. 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?**

**KPC Response:**

12. This has clearly not been demonstrated by the Council in its documentation submitted to the Inspectorate.
13. We note that the Council held a 'limited consultation' on its 'Additional Technical Evidence' in September – October 2022 on the following documents:
  - EB98 Traffic Forecasting Report Addendum
  - EB108 Sustainable Transport Strategy Addendum
  - EB109 Transport Funding and Delivery Plan
  - EB110 Infrastructure Delivery Plan (IDP) Addendum Report
  - EB111, 11a, 11b Stroud Local Plan Viability Assessment 2022 Refresh Report
  - EB112 SALA Accessibility Scoring Note
  - EB112 a,b,c SALA Transport Accessibility Assessment
14. The Council has made no changes to the Pre Submission Plan that was published in 2021 so it is not possible for these evidence base documents to have influenced the location of development and the overall strategy during plan-making.

**Q8. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?**

**KPC Response:**

15. It is not entirely clear from the Council's evidence base whether the Council has sought to make the most effective use of PDL and the housing supply evidence appears to be rather dated - November 2020 (Housing Land Supply Assessment Update) and refers to current "deliverable housing supply" on three sites (Tricorn House), Wimberley Mill and Daniels Industrial Estate and states that it can demonstrate a more than 6-year deliverable supply without relying on brownfield sites. See paragraph 2.16 of the Housing Land Supply Assessment Update (November 2020):

*The Housing Land Supply Assessment Update November 2020 provides the latest evidenced schedule of large site progress and anticipated delivery from developers and site promoters for all major development sites and adopted*

*Local Plan allocation sites identified as contributing to the five-year supply of deliverable sites. Whilst the current deliverable housing supply includes brownfield redevelopment at Tricorn House (43 units), Wimberley Mill (104 Units) and Daniels Industrial Estate (50 units), the Council can demonstrate a more than 6-year deliverable housing supply without relying on brownfield sites in the event that development does not come forward as anticipated.*

16. The Council's Topic Paper on the Development Strategy only makes one mention of 'brownfield land' at paragraph 1.13 where it states:

*The greatest support was for concentrated growth, with similar levels of support for the other three options. Some respondents suggested an alternative option 5 for future new development, generally supporting a hybrid approach of two or more of the above four options. Other suggestions for a future growth strategy included focusing development along the major transport corridors, close to employment areas and/or on **brownfield land**. We considered these suggestions as part of the development of the subsequent hybrid strategy approach and reviewed, in particular, the notion of a corridor approach to growth at the later Additional Housing Options stage.*

**Q9. Do Core Strategy Policies CP2 and CP4 take a sufficiently strategic approach to clearly define the development strategy for the District as a whole? Should consideration be given to a new policy encompassing the elements of the District wide spatial strategy that are set out in chapter 2 of the Plan, such as the key development strategy headlines?**

**KPC Response:**

17. Policy CP2 simply sets out the quantum of growth for each settlement and Policy CP4 sets out key place-making principles. We are supportive of the need for a new policy encompassing a District wide spatial strategy because the Plan as currently drafted contains no such policy.

**Q10. Paragraph 23 of the Framework states that broad locations for development should be located on a key diagram. Can the Council clarify whether Map 3 (page 24) in the Plan is the key diagram?**

**KPC Response:**

18. This should be clarified by SDC as there is no mention of a key diagram currently in the Local Plan.

**Q11. Will the spatial strategy promote the vitality of town centres in the District and support a prosperous rural economy, as required by national policy?**

**KPC Response:**

19. In respect of the Wotton Cluster, the strategy is to accommodate the new population in Kingswood rather than in Wotton under Edge which seems to undermine the strategy to promote the vitality of an important local centre (Wotton under Edge). Increased car traffic between Kingswood and Wotton under Edge will result in more traffic and congestion on the rural roads and put additional pressure on parking in Wotton under Edge and as a result of increased traffic, deteriorate the environmental qualities of the area.

**Q12. 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?**

**KPC Response:**

20. ‘Cumulative total’ is not clear and should be removed.

21. It is not consistent with the term ‘approximately’ which needs to be clarified and made consistent throughout the local plan to avoid any confusion.

**Q13. Core Policy CP4 states that all development proposals shall accord with the mini visions, have regard to the guiding principles and shall be informed by other relevant documents. It also identifies that development will be expected to integrate into the neighbourhood, place shape and protect or enhance a sense of place and create safe streets, homes and workplaces.**

- a. Is the approach in the policy justified and effective? Is its intention clear and is it consistent with national policy?
- b. Does the policy set out clear development requirements, or are these more clearly defined in other Plan policies? If so, why is there duplication?
- c. Reference is made in the policy’s supporting text, at paragraph 9.22, to the National Design Guide. How does the policy relate to the updated 2021 version of this national guidance?

**KPC Response:**

22. There are a number of important requirements for development proposals set out in Policy CP4 therefore KPC considers it important to retain these however the intentions and development requirements could be made clearer in the policy.

23. Reference to the National Design Guide should be updated to reflect the latest version.

**Q14. Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?**

**KPC Response:**

24. As we set out above the spatial strategy and distribution of development will fail to meet the Vision and Objectives of the Local Plan.

**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.

**Q15. 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?**
- 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?**

**KPC Response:**

25. SDC states the following about Kingswood in its Settlement Role and Function Study

*Conversely, some of our smallest and lowest tier settlements have really good accessibility – by virtue of close proximity to higher tier settlements, or proximity to key transport corridors, or good, regular bus services, or all of the above (in some cases, level terrain for walking or cycling represents an additional 'boost' to their accessibility credentials): North Woodchester,*



*Thrupp, Kingswood, Selsley, Brimscombe and Newport stand out in this respect. Eastcombe and Newtown/Sharpness are somewhat more surprising.*<sup>1</sup>

*In accessibility terms, the following settlements offer relatively sustainable locations for potential growth and development, despite their lower tier status / smaller size. They benefit from their proximity to larger service-centre settlements and / or their location on key transport corridors, where there are good established transport services and / or the potential to make improvements (including improving walking or cycling connectivity):...*

*Kingswood offers very good accessibility to Wotton-Under-Edge and to key services and facilities.*<sup>2</sup>

26. As we have set out, Kingswood is not a sustainable location for additional development and growth. Its proximity to Wotton under Edge does not make Kingswood itself sustainable. In order for Kingswood residents to access Wotton under Edge they need to walk or cycle approximately 1.5 miles along the busy Wotton Road which is unlit and requires crossing the road multiple times to access the footpath as the footpath is not uninterrupted. It is not a “level terrain” as stated by SDC, as the land rises up heading north along the Wotton Road.

27. We note from SDC’s SALA Transport Accessibility Assessment<sup>3</sup> that for the sites in Kingswood it assumes the highest score for access to primary school. Yet, as we set out in more detail in our representations and in the section on proposed site allocations in Kingswood, this assumption would require that there are sufficient school places to accommodate additional growth in Kingswood which is not the case. The site assessment evidence base should be updated to reflect this.

**Q19. Very small settlements are not included in the hierarchy and instead are considered to be part of the countryside. Is this approach justified?**

**KPC Response:**

28. It appears that the Council is overlooking an important housing supply in very small settlements where limited development is required to help sustain the local community and viability of each settlement. It is considered that these settlements should be identified in the hierarchy and have settlement development limits / boundaries.

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<sup>1</sup> EB72 – Settlement Role and Function Study Update (2018) – paragraph 3.28

<sup>2</sup> EB72 – Settlement Role and Function Study Update (2018) – paragraph 3.37

<sup>3</sup> EB112a – SALA Transport Accessibility Assessment (Nov 2020)

**Q20. Settlement development limits (SDL) or boundaries have been identified. Appendix A details proposed changes to some existing SDL on the policies map.**

- a. Is it clear how SDL have been defined and are they justified and effective?
- b. Are the reasons for the proposed changes to the SDL clearly explained? Do they just incorporate completed development into the settlement boundaries? Do any of the proposed changes involve land within the AONB?
- c. It appears that the SDL proposed changes do not extend to include some committed development sites currently under construction and the proposed site allocations within the Plan. Whilst some explanation has been provided in the Council's response to the representations, we remain concerned that this approach would create policy conflicts for decision-makers when determining future planning applications for these sites, as they would be outside the defined SDL. Can the Council provide more detailed clarification on why they consider their approach is sound?
- d. Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?

**KPC Response:**

29. This question does not appear to have implications for Kingswood as the SDL for the village is unaltered in the Local Plan.

**Q21. The hierarchy indicates that for Tiers 1, 2 and 3a further development may 'exceptionally' be permitted adjacent to the SDL, subject to meeting other Plan policies. For Tiers 3b and 4 the policy indicates that there could be scope for some or very limited development on land adjoining settlements, to meet specific local needs. Figure 3 in the Plan (pages 56 and 57) lists the types of development that could be permitted adjoining SDL, for each settlement tier.**

- a. 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'?
- b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development would be 'adjacent to settlements', 'edge of settlements', 'adjoining SDL' or 'immediately adjoining'?
- c. Is the purpose of Figure 3 in the Plan clear? Does it form the supporting text to Core Policy CP3 or does it form part of the policy? Is it clear to developers and decision-makers as to what type and scale of development may be acceptable

**adjoining the SDL and when the exceptions would apply? How have these been determined and are they justified and consistent with other Plan policies e.g. affordable housing?**

**KPC Response:**

30. As currently written Policy CP3 is not sound. It explains for each of the settlement types in the hierarchy in relation to 'settlement development limits' that development will 'exceptionally' be supported adjacent to 'settlement development limits'. The policy does not explain what these exceptional circumstances are.
31. The Kingswood Neighbourhood Plan<sup>4</sup> (see Policy SL1 Kingswood Settlement Development Limits Boundary) does set out the exceptional circumstances where development would be permitted which is for development necessary for the purposes of agriculture or forestry, etc without harming the countryside, essential community facilities / infrastructure, replacement dwellings and enabling development to maintain a heritage asset. The policy is not for meeting 'local development needs' as the Draft Local Plan is written.
32. Despite this Neighbourhood Plan policy neither the settlement development limit, nor the criteria for developing on an exception site outside of the boundary has been respected by SDC. For example, site KIN006 (as referenced in the 2017 SALA) was not allocated in the Local Plan but gained planning approval for 50 houses regardless.

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<sup>4</sup> [Kingswood Neighbourhood Plan \(Made 18<sup>th</sup> May 2017\)](#)



Figure 1: Extract from Kingswood Neighbourhood Plan Policy SL1 Kingswood Settlement Development Limits Boundary

33. Figure 3 is utterly confusing and only complicates matters further. It should be simplified or removed altogether. In either case this policy requires much further explanation and justification before it can be found sound.

**Q22. The text on page 23 of the Plan also states that some limited development on small and medium sites immediately adjoining SDL for tiers 1-3 will be allowed, to meet specific identified local development needs.**

**a. What is the status of this text and is it consistent with the policy wording in Core Policy CP3? If not, are any changes necessary to remove any ambiguity and ensure policy effectiveness?**

**b. Is it clear how local needs will be defined and what will be the criteria for this?**

**KPC Response:**

34. This text referred to at Paragraph 2.3.11 of the Local Plan is concerningly ambiguous and appears to leave an 'open door' to speculative development without being justified through evidence.

**Q24. Core Policy CP3 does not specify an ‘up to 9 dwellings’ limit, though Delivery Policy DHC2 does.**

- a. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? Reference is made to the 9 dwelling limit in Figure 3 but this does not appear to form part of Core Policy CP3. Is this correct?**
- b. In addition Figure 3 also states that for these tiers such development would be ‘not exceeding a 10% cumulative increase in the settlement’s total dwellings during the Plan period’. How will this be assessed and is this approach justified? Should this be included in the policy wording or does Figure 3 form part of the policy?**
- c. How does Core Policy CP3 relate to Delivery Policy DHC2? Are the policies consistent or is there unnecessary duplication and/or unclear requirements?**

**KPC Response:**

35. As pointed out it is currently unclear and inconsistent throughout the policies in the Local Plan.

**Q26. 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?**

**KPC Response:**

36. As we have set out in our comments and previously submitted representations the settlement hierarchy and the development strategy are clearly at odds therefore cannot be clearly explained by SDC.

37. The settlement hierarchy and the development strategy are not justified, effective or consistent with national policy and are therefore unsound.

**Site selection methodology**

*(Our questions here only relate to the site selection process. Questions on specific site allocations are set out under later matters. Also our questions on site selection to meet gypsy, traveller and travelling showpeople accommodation needs are set out in a later matter.)*

The Council’s methodology for site assessment and selection is set out within the Strategic Assessment of Land Availability 2016 (SALA) (EB18) and explained in the Topic Paper: Assessment and selection of sites topic paper (EB9).

Chapter 2 of EB9 summarises the site selection process timeline and lists the studies and assessments used to determine the suitability of sites for development along with their availability and achievability.

**Q27. Is the site selection methodology justified and does it accord with national planning policy and guidance?**

**KPC Response:**

38. We would first like to point out what appears to be a misleading statement or an error by SDC. The Council states in its Assessment and Selection of Sites Topic Paper<sup>5</sup> that 47 sites were excluded from the SALA for various reasons, and it refers the reader to Appendix 4 of the SALA Report of Findings<sup>6</sup>. However, upon closer inspection of this document there appears to be more in the region of 175 sites that were rejected by SDC as part of this process.

39. Apart from SDC’s figure being factually inaccurate by a considerable number, many sites have been rejected outright due to their location “beyond Settlement Tiers 1, 2 and 3’ which does not provide a full picture of land availability and potential suitability throughout the District. These sites should not have been rejected so quickly in the process as they could be useful sources of housing supply in the future.

**Q28. 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?**

**KPC Response:**

40. Please see our response to Q27.

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<sup>5</sup> EB9 – Assessment and Selection of Sites Topic Paper – paragraph 2.1.3

<sup>6</sup> [EB19d – SALA 2017 – Appendix 4 Rejected Sites](#)

**Q29. Has the sequential test, and exception test where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?**

**KPC Response:**

41. In its Assessment and Selection of Sites Topic Paper<sup>7</sup>, SDC refers the reader to the Stroud Level 2 SFRA which tabulates the results of detailed assessments of proposed site options. However, the SFRA does not undertake a Sequential Test or Exceptions Test, but it does provide the guidance for what SDC needed to undertake in relation to these tests as part of its Local Plan preparation<sup>8</sup> nowhere has the Sequential Test for plan-making been undertaken to fulfil the requirements of the NPPF (Paragraph 161).

**Q30. Overall, has the process robustly identified and assessed all relevant sites?**

**KPC Response:**

42. Please see our responses above.

**END.**

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<sup>7</sup> EB9 - Site Selection Topic Paper – paragraph 2.5.6 (4<sup>th</sup> bullet)

<sup>8</sup> EB54 – Strategic Flood Risk Assessment Level 2 (2021)