

Stroud District Local Plan Review – Emerging Strategy Paper Comments on Behalf of Persimmon Homes Severn Valley

The following comments on the Stroud District Local Plan Emerging Strategy Paper are submitted on behalf of Persimmon Homes Severn Valley. They respond to a number but not all of the specific questions in the strategy paper.

Question 1.0a – Have we identified the top five issues for you?

In respect of key issue 1, Persimmon Homes Severn Valley support a strategy to concentrate housing and employment growth in tandem in the A38/M5 corridor, which will support issue 2 to conserve and enhance countryside and biodiversity.

In respect of issue 3, we do not support prioritising the use of brown field land. NPPF paragraph 117 says policies for meeting objectively assessed needs should make as much use as possible of previously-developed or 'brownfield' land, rather than prioritising such land.

Local Economy and Jobs – Question 2.1a Do you agree with the ways in which the emerging strategy intends to support the local economy and the creation of jobs?

Persimmon Homes Severn Valley support the strategy of providing additional economic growth with the M5/A38 growth corridor.

A Local Need for Housing – Question 2.3a Do you agree with the ways in which the emerging strategy intends to meet local housing need?

Section 2.3 quite rightly recognises that Government policy continues to be to significantly boost the supply of homes and that it is introduced a standard methodology for assessing housing supply, which is currently 638 new homes per annum in Stroud. However, it is important to emphasise that this only provides the starting point for assessing housing needs and it is also necessary to consider additional needs required to support economic growth, deliver affordable housing and meet unmet needs from elsewhere, which are all key issues in Stroud which should be addressed.

We recognise this presents a considerable challenge in delivering these numbers. Therefore it is important that the Council identifies housing sites which are genuinely deliverable, firstly to meet housing needs, but also to ensure the Council can meet the requirements of the Housing Delivery Test, by identifying a wide range of sites by size and market locations.

In response to the actions proposed in the emerging strategy, we have the following comments.

A Mix of Brownfield and Greenfield Sites and to bring forward Sites on the Brownfield Land Register

The intention to deliver a mix of brown field and green field sites and to bring to forward sites on the brown field register is supported. However NPPF paragraph 117 does not say brown field sites should be prioritised only that as much use as possible should be made of previously developed land. We note the general consensus is that development should be focussed on brown field and derelict areas within settlement boundaries. However that is

simply unrealistic to meet the needs for 638 houses per annum and at least 5,700 new homes to meet the total requirement of 12,800. The total capacity of sites on the Council's brown field register is only about 1,965 units, of which over half are as part of mixed use sites, where the mix of uses could result in a reduction to the number of potential residential units. Therefore even if all of these units come forward it would only meet 34% of the outstanding requirement. Equally there is no certainty that all these sites are developable and deliverable which is a requirement that the Local Plan must meet.

A proportion of affordable homes on all sites of 10 dwellings or above

The appropriate proportion of affordable homes on sites should be properly assessed, to determine the size, type and tenure of housing needed for different groups (NPPF paragraph 61). In addition, on sites of 10 or above at least 10% of homes should be available for affordable home ownership. Then in setting out the levels and types of affordable housing provision required along with other infrastructure requirements, it should not undermine deliverability of the plan. Any affordable housing should meet the clear definition in the NPPF glossary and all affordable homes should contribute towards meeting the assessed affordable homes needs identified.

Minimum Dwelling Sizes

If the Council wishes to include policies on minimum dwelling sizes, this should be based on clear local evidence. The Government introduced national technical space standards in 2015 (the nationally described space standard (NDDS)). However a Ministerial Statement dated the 25th March 2015 said that *'the optional new technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG.'* The NPPG then sets out that *'where a need for internal space standards is identified, Local Planning Authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas of need, viability and timing'* (NPPG ID56-020). In addition footnote 46 of NPPF paragraph 127f says *'Policies may also make use of the nationally described space standard where the need for an internal space standard can be justified.'*

Therefore it is clear that any minimum dwelling size policy much be supported by robust evidence.

A Mix of Dwelling Types

Persimmon Homes Severn Valley support the provision of a mix of dwelling types which is required by NPPF paragraphs 61 and 62, this again should be supported by relevant up-to-date evidence (NPPF paragraph 31), which should be locally based in order to respond to circumstances in Stroud. We note that under issue 5 respondents suggested encouraging developers to build smaller homes and again we support that. Indeed at our current development in Berkeley, 61% of the homes are two bed and 89% two and three bed.

Flexible Lifetime Homes

As in the case of minimum dwelling size, if the Council wishes to use lifetime home standards it must provide clear local evidence of the need to do so in accordance with the Written Ministerial Statement of the 25th March 2015 and footnote 46 of NPPF paragraph 127f referred to above.

Build to Rent Homes

Build to rent homes should also be evidenced by need in a housing needs assessment.

Exception Sites

We support provision in the Local Plan for exception sites.

Self and Custom Built Homes

Firstly in order to justify provision of self-build and custom-built housing it will be necessary for the Council to demonstrate evidence of need. This should be addressed in the SHMA using data in the Council's Self-Build and Custom House Building register. However the register on its own is a blunt tool and NPPG 57-011 advises that Authorities should use the demand data from the registers supported by additional data from secondary sources.

Then if there are appropriate people on the register the question of whether are they in a position to proceed needs to be assessed.

- Do they have savings?
- How much deposit can they pay?
- Do they need additional finance?
- If so, what is the maximum they can access and afford – lack of suitable mortgages have been an impediment in the past?
- Do they have the necessary expertise to manage a self-build project or building experience or finances to instruct others?

PHSV support the identification of additional sites specifically for self-build housing. However we do not support the requirement for a proportion of self-build plots on other residential allocations. National Planning Policy and Guidance is to significantly boost supply of homes and increase delivery. Relying on plots on normal residential sites does not increase supply but merely changes the provider of the same number of units. It can also impact on delivery. Our experience elsewhere suggests self-build homes have the opposite effect due to practical and management problems relating to health and safety, working hours and the length of build including:

- Slow take up and Reserve Matters periods running out;
- Ad hoc builders turning up outside specified working hours;
- Storage of materials if there is limited room on individual self-build plots;
- Purchasers having to stop building due to unemployment/lack of funds or bad site management;
- Our own purchaser dissatisfaction where building continues on site which was expected to finish when they moved in;
- Conflicts with the Design and Access Statement for the site.

In respect of viability, the provision of self-build plots will also need to form part of the Viability Assessment of the plan's policies and proposals.

NPPG57-025 in addition sets out other ways the Councils' can support self-build and custom-build housing including by using their own land, engaging with landowners and working with

custom-build developers, all of which would enable the allocation of specific self-build plots rather than relying on self-build plots on other residential schemes.

Local Green Space and Community Facilities – Question 2.4a Do you agree with the ways in which the emerging strategy intends to protect existing or deliver new Local Green Spaces and community facilities?

Any standards for open space, sport and recreation facilities should be based on the 2018 Green Infrastructure, Sport and Recreation Strategy, taking account of changes since the 2013 study and current demand.

A Vision for the Future – Question 3.1a Do you agree with the vision for 2040 as drafted?

The new vision maintains continuity with the vision of the adopted Local Plan which we accept is important to ensure a consistent long-term framework for the detailed planning policies. One element of the vision is that the district supports a network of market towns which we consider is particularly important in Stroud and therefore the policies in the Local Plan Review should enable that to continue.

The Emerging Growth Strategy – Question 5.2a Do you support the broad approach of the emerging growth strategy, in terms of distributing the growth required by national policy for Stroud District?

As set out in response to Question 2.3a it is important that the strategy specifically enables the delivery of the requirements resulting from the application of the Government Standard Methodology for assessing housing supply appropriate and the time and currently 638 new homes per annum in Stroud.

Strategy Options

Whilst the four specific policy options are selected for testing general principles and on their own are not realistic individual strategies, it is important to recognise the impacts of each within the overall strategy emerging and our views are as follows:

Option 1 Results in over concentration with insufficient emphasis on the market towns and supporting their continued vitality.

Option 2 Is a wider distribution which better reflects the existing settlement pattern and which supports the vision, but ultimately is dependent on the locations that make it up. However, it would appear to conflict with key issue 1 of concentrating housing development at locations with the best services and facilities.

Option 3 Is clearly unsustainable and is unlikely to provide the necessary services to support development and will clearly not meet key issue 1 of concentrating housing development. It could be refined in accordance with NPPF 78 to concentrate development in key villages to support groups of smaller settlements, if it is to form an element of the emerging strategy.

Option 4 This is a concentration strategy relying on only three locations which we consider unrealistic in isolation and would not address the key issues.

Emerging Strategy

In terms of the strategy which emerges from this test in process we have the following comment:

- We support concentrating housing growth at the main towns, particularly at Cam, but recognising that opportunities at Stroud are limited and the timing of delivery of brownfield sites is uncertain;
- It is right that modest levels of growth should be identified at the local service centres, but again it is important that the limited capacities at Minchinhampton, Nailsworth and Painswick is recognised. It is clear that the strategy should include market and affordable housing at the local service centres and the statement that *'sites will be focussed on meeting local housing needs'* is too narrow if the intention is to restrict market housing in these locations.
- We agree that growth should also be delivered at key villages, particularly those that are less constrained, such as Kingswood;
- There needs to be greater clarity on how the strategy will work at the smaller settlements. Currently it appears (page 32) that only exception sites of up to 20 dwellings will be permitted adjoining Tier 1–3 settlements, but at Tier 4 and 5 settlements small market housing sites will be permitted outside development limits. Therefore a more relaxed housing strategy would be applied at the smallest lower tier settlements and at Tiers 1-3;
- Two new settlements at Sharpness and Wisloe - we have a number of concerns about the proposal to include two new settlements as part of the strategy. These are:
 - the ability of the area to support and deliver two new settlements;
 - the ability of new settlements to deliver sufficient numbers in the plan period;
 - in other Local Plan examinations a number of new garden village proposals have been deleted;
 - the reliance on garden village principles including land value capture and enhanced design requirements will have implications for the delivery of infrastructure and ultimately deliverability of the project;
 - we are concerned about the location of a new garden village at Sharpness which does not support a concentration of employment growth in the A38/M5 corridor and concentrate housing where there is currently best access to jobs;
 - the lack of any development partner at Wisloe (promoted by the County Council and a land trust) and a volume developer at Sharpness which will be necessary if sufficient numbers are to be delivered;
 - the impact of both proposals on the strategic road network and in respect of Sharpness, notwithstanding the ambitions for sustainable transport within the new settlement, it is otherwise entirely reliant on road connections for external links but no principles or details are provided and so there is no certainty of the delivery of any necessary highway improvements.

Sustainability Appraisal

The recommendation in the Sustainability Appraisal (November 2018) is for a hybrid option which resembles the concentrated option but also includes growth at one or two growth points and/or one or two of the smaller towns and larger villages. We support the general principle of this approach but it opens up a number of options for achieving it, all of which

will need to be properly tested through the SA process and demonstrate the outcome has not been prejudged. In particular the variables include the number of growth points, location of growth points, whether there should be freestanding new settlements or additions, the number and location of development in other towns and villages, the timing of the delivery of the various options, etc.

The Emerging Growth Strategy and Settlement Development Limits

The following comments respond to questions 4.3a, 4.3b, 4.3c, 4.4a, 4.4b, 4.4c and 4.4d. The general definition of a hierarchy is that it is a ranking of items and in this case settlements, which in planning terms is generally used as the basis for determining the levels of growth appropriate at each level. The emerging strategy paper says *'the largest towns containing the best range of services and facilities are in the top tier. These are the primary focus for growth, providing significant levels of homes and jobs.'* The problem in Stroud district is that this is not always the case, both at the top level and lower down, where constraints in some settlements restrict the ability to provide commensurate levels of growth. Therefore the hierarchy does not provide a consistent guide for arranging settlements to determine appropriate levels of growth. It is therefore more of a classification of settlements by current size and level of facilities rather than a basis for planning future housing numbers, by either ranking or number of houses proposed.

Having ranked the settlements there is also a substantial difference in the potential numbers of dwellings identified at settlements in each tier. At Tier 1, this ranges between 105 and 935, at Tier 2 the range is 20-150 and at Tier 3A it is 30-190. Notably both the lowest and highest numbers at Tier 3A settlements are higher than both the lowest and highest numbers at Tier 2 settlements. If Cam and Dursley are combined together in the same way at Brinscombe and Thrupp are treated the hierarchy by size of potential allocations (excluding the new settlements) is as follows:

Tier 1	Cam and Dursley	1,040
Tier 1	Stonehouse	686
Tier 1	Stroud	265
Tier 3A	Brinscombe and Thrupp	190
Tier 3A	King Stanley	161
Tier 2	Minchinhampton	150
Tier 2	Berkeley	120
Tier 2	Nailsworth	105
Tier 3A	Kingswood	100
Tier 3A	North Woodchester	54
Tier3A	Leonard Stanley	30
Tier 2	Painswick	20

We support the identification of Cam and Dursley in Tier 1 and the identification of the highest numbers there, which includes land controlled by Persimmon Homes Severn Valley which we are jointly promoting together with other land controlled by Robert Hitchins Ltd at Draycott, Cam.

We also recognise the sustainability of Kingswood as a location for further residential development in proportion to numbers identified at Tier 2 settlements (Berkeley and Nailsworth).

In addition, our current development at Berkeley demonstrates the demand in that settlement and suggests greater than 120 units could be provided there.

Taking account of the above we have the following comments on specific questions.

In respect of 4.3a (Are any of the settlements in the wrong tier?) we consider the hierarchy should be used to classify the settlements in terms of the services and facilities available and it should be made clear that other factors will determine the level of development appropriate at each. Therefore in respect of 4.3c we agree that future growth should be targeted to settlements across all Tier 1 to 3a settlements, based on their sustainability balanced against their constraints and taking account of opportunities, with only very limited growth at Tier 3b to 5 settlements.

In the first instance the plan should ensure sufficient sites are specifically allocated across the Tier 1, 2, Tier 3a settlements to ensure the housing numbers can be delivered and to provide certainty. However there are often unforeseen circumstances and in view of Government Policy to significantly boost housing supply, it is important the plan also includes a policy mechanism to allow windfalls and exceptions to meet any shortfall, both inside and adjoining but closely related to settlement boundaries. An example of one such mechanism is included in the Sedgemoor Local Plan 2011-2032, which will be adopted on the 20th February 2019. This includes the following policy mechanism under the heading '*Managing Housing Delivery*' as part of the Spatial Strategy Policy:

'Managing Housing Delivery

Development proposals will be expected to support the delivery of the required infrastructure in accordance with the Council's infrastructure Delivery Strategy (IDS). This will include flood defence, transport, community and cultural facilities, health care, education, and green infrastructure.

The Council will manage housing delivery positively and proactively throughout its housing trajectory, ensuring that a minimum of five years deliverable land supply for housing is maintained. The release of additional unallocated greenfield land for housing (ie in addition to sites that can come forward under criteria based policies T3, T5, T10 and D10) will only be approved where through monitoring it is demonstrated that there is a shortfall in the five year supply of deliverable land supply for housing. In such circumstances, the release of sites of an appropriate scale will be considered at Bridgwater, Burnham-on-Sea and Highbridge, and Tier 1 and 2 settlements, given that they have the potential to accommodate strategic levels of growth. Sites should normally be identified in the SHLAA as having 'future potential' and satisfy the requirements of other relevant policies in the Local Plan and Neighbourhood Plan (where applicable).'

The strategy should review all settlement levels. Policy guidance on boundaries should form part of a package of policies and whether or not settlement levels are defined for Tier 4 and 5 villages (and maybe even Tier 3b) paragraph 77 of the NPPF provides clear guidance:

'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local Planning Authorities should support opportunities to bring forward rural exception sites that would provide affordable housing to meet local needs, and consider whether allowing some market housing on these sites would help to facilitate this.'

This enables the Local Authority to make a choice of whether to include settlement boundaries or not in the rural areas. If settlement limits are defined, there need to be clear guidance to enable development in accordance with NPPF 77 adjoining boundaries and allowing appropriate enabling development (including a proportion of market housing) to enable the delivery of local housing needs and infrastructure requirements. These principles also need to be built into any criteria policy approach if no settlement boundaries are defined.

In response to questions 4.3c, 4.4a and 4.4c, due to the substantial differences between settlements in Stroud, including between settlements in each tier, we support an approach which enables growth and the impacts of growth to be assessed and managed on a settlement by settlement basis. This should be through an overall criteria based policy, with any specific guidance included within the continuation of the mini-vision approach.

Question 5.1a Assuming some growth is desirable, have we identified the best site(s) at each town and village?

Cam and Dursley Cluster

See separate representation submitted on behalf of Persimmon Homes Severn Valley and Robert Hitchins Ltd by Pegasus.

Berkeley Cluster

The plan proposes a new community of up to 2,400 dwellings at Newtown and Sharpness. The emerging strategy document identifies the first key issue as *'ensuring new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development.'* A key element in achieving that is *'concentrating employment growth within the A38/M5 corridor and at locations in tandem with housing growth'* and that *'new employment together with new housing to create sustainable communities.'* It is not clear how major development at Newtown/Sharpness accords with these strategy aims, because the location is not in the A38/M5 corridor and is remote from the strategic highway network, access to which is a key requirement for employment. Whilst another element in the strategy is to create new sustainable communities at locations where development can transform existing access to services and infrastructure and noting that Berkeley will be *'benefitting from improved transport links to elsewhere, delivered by the new community at Sharpness'*, there is no indication of any proposals emerging in the plan that will transform access to services and infrastructure in this way. The promotion document which is a supporting document to the emerging strategy only includes illustrations which are beyond aspirational for tram systems and bridges.

Wotton Cluster - Kingswood

The update of the Settlement Role and Function Study summarised in the section on the Wotton Cluster confirms Kingswood should accommodate further growth in the plan period. It is a medium sized village, has basic, but sufficient local retail facilities, has a good level of local community services and facilities and very good access to services elsewhere. Crucially, Kingswood has an employment role with two Key Employment Sites within the village, the nearby Renishaw facility and Katherine Lady Berkeley School. So whatever the eventual strategy this confirms Kingswood should have a role in meeting further development needs. In that respect Persimmon Homes Severn Valley support the identification of site PH38 to contribute towards meeting those needs.

In considering the specific site, none of the constraints identified to development at Kingswood Village of flood plain to the north, the Kingswood conservation area and listed buildings, the Ozleworth Brook key wildlife site or protected open spaces affect this land.

The sustainability appraisal (November 2018) demonstrates that the vision for the Wotton Cluster is expected to have minor positive effects in relation to SA objective 5. Vibrant Communities, 6. Services and Facilities, 10. Air Quality, 14. Climate Change, 16. Employment and 17. Economic Growth. It also confirms that growth in Wotton-under-Edge is restricted to meeting the needs of the surrounding rural communities and development in the smaller settlements will be small scale for local needs. This emphasises the key role of Kingswood in contributing towards meeting housing requirements in the cluster so that there will be minor positive effects in relation to SA objectives 3. Social Inclusion, 8. Landscapes/Townscapes and 9. Historic Environments.

The SA also contains detailed appraisal matrices for this land which was assessed both at the previous options stage (site KIN005, land at Cloverlea Barn, Kingswood) and for the current emerging strategy (site PS38, south of Wickwar Road, Kingswood). Both assessments show the land generally scores very highly and only has two negative impacts in relation to SA objectives 10. Air Quality and 13. Efficient Land Use. This assessment is common to many of the sites assessed throughout the district. The site has a minor negative impact on flooding, but a previous proposal on the land demonstrated that this can be addressed through onsite balancing. Overall the site performs at least as well as or better than the other sites in Kingswood considered at the Issues and Options stage.

The Landscape Sensitivity Assessment (December 2016) summary for Kingswood said:

'The preferred directions for housing growth for Kingswood are to the south west close to the settlement edge and contained by strong hedges with trees to the west (K03) and to the south east contained by riparian corridor trees to the east (K04).'

The land at Cloverlea Barn is within the site identified above as K03. This is a larger cell embracing a wider area of land south west of Kingswood. Nevertheless in terms of four assessment categories (high, high medium, medium and medium/low) whilst the land was assessed as having high landscape sensitivity for employment development it was only medium sensitivity for housing development. Landscape appraisal work carried out for the previous proposal confirms a smaller parcel (ie the Cloverlea Barn land itself) performs better and it is that area which is close to the settlement edge where it is located behind existing frontage residential development and that this field is particularly well contained by strong hedges and trees.

This is confirmed in the Landscape Sensitivity summary for housing use for parcel K03 on page 200 of the Landscape Sensitivity Analysis as follows:

'The sensitivity of this area lies in its open pastoral character of the south, views from local footpaths and minor roads, the riparian corridor to the east and the mature trees and hedgerows. Its value lies in the PROWs passing through the area. Housing development may be appropriate in the small fields just south of Wickwar Road and east of the wooded track, adjacent to existing housing and screened by existing hedgerows which would need to be conserved and retained.'

Again this refers specifically to the Cloverlea Barn site.

Also in respect of SA objective 8: Landscapes/Townscapes, the assessment confirms the land is not within the Cotswold AONB or within 500 metres of the AONB.

In terms of the SALA 2018 Heritage Impact Appraisal, the SA confirms the site was screened out as having no heritage impacts.

In confirming all of the above, the 2017 SALA site assessment for site KIN005 (Cloverlea Barn) in summarising potential impacts confirmed the heritage and landscape sensitivity assessments described above and in addition confirmed that an initial desktop biodiversity and geodiversity assessment of the site has indicated there is potential to develop the site without harm to a designated natural environmental site. The assessment summarised the suitability of the site as follows:

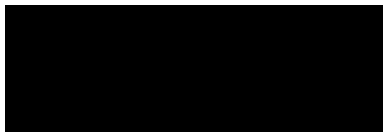
'Although not currently policy compliant, the site has no overriding physical constraints or potential impacts preventing development for housing or community uses in the future should the Local Plan Strategy identify the need for growth in this location.'

Clearly that time has now come - there is a need for housing growth in Stroud, the emerging strategy indicates some growth should be accommodated in Kingswood and where this site relatively unconstrained with few impacts.

The SALA assessed the site suitable for low density development at an average density of 20/25 dph for 35-45 dwellings. However in the light of the demand for more smaller homes, the need to make efficient use of land and to meet affordable housing needs, the previous scheme demonstrated a larger potential capacity of up to 61 two to four bed units which would have provided a policy compliant for the contribution of 19 affordable homes.

In summary the emerging strategy sets out the need for growth in Kingswood and in accordance with the SA, the Landscape Sensitivity Assessment and the SALA assessment, site PS38 is suitable to contribute towards meeting that growth and Persimmon Homes Severn Valley support its allocation.

I confirm that Persimmon Homes Severn Valley wish to remain on the consultation database and to receive future updates as the Local Plan Review progresses.



18th January 2019