

Examination of Stroud District Local Plan Review

Further written statements on behalf of Alexandra Orchard

Matter 2 - Spatial strategy and site selection methodology

14th February 2023

Introduction

1. These further written statements have been prepared by Zesta Planning Ltd on behalf of Alexandra Orchard (the representor). A duly made representation to the Regulation 19 consultation on the plan was made by the representor in July 2021 (representation ID 603). A copy of this representation is provided along with these statements.
2. The representor would like to provide further written statements on Matter 2 (Spatial Strategy and site selection methodology), Matter 6 (Site Allocations) and Matter 6b (Stroud Valley Site Allocations). A separate statement is provided for each of these matters.
3. This statement relates to Matter 2 - Spatial Strategy and site selection methodology.

Matter 2 - Spatial Strategy and site selection methodology

4. The representor would like to make further statements on questions 4, 5, 6 and 20 as set out below.
 - **Question 4 - 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?**
 - **Question 5 - Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?**
5. The plan's spatial strategy is based on a hybrid approach whereby the majority of housing and employment development is concentrated at a number of large sites, located on the edge of Gloucester, Cam and Stonehouse respectively, in addition to

two new settlements at Newtown/Sharpness and Wisloe. The strategy involves a small element of dispersal to the smaller towns and larger villages.

6. Core Policy CP2 allocates 22 sites with a total capacity of 9,065 dwellings. Of these sites, 8 relate to strategic sites or new settlements with a combined capacity of 8,080 dwellings. This means that the vast majority (89%) of the growth allocated within the plan is proposed to take place at predominately large strategic sites or at new settlements. Only a very small proportion of the proposed growth (985 dwellings or 11%) is proposed to take place on smaller sites in the District's smaller towns and larger villages.
7. The representor considers this to represent an unbalanced distribution of development with an overreliance on large sites and new settlements.
8. Concerns are expressed over the timescales associated with the delivery of the plan's strategic sites and the implications of this for short term housing land supply in the plan area. It is considered that there are likely to be long timescales associated with land assembly, design and planning of the necessary infrastructure required for these sites. This may present the Council with future problems being able to maintain a rolling five year supply of deliverable housing sites.
9. It is also considered that the plan's spatial strategy is not consistent with national policy set out within the NPPF as it does not seek to allocate a sufficient range of small to medium sized sites.
10. Paragraph 69 of the NPPF makes it clear that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. It states that, to promote the development of a good mix of sites local planning authorities should (inter alia) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.
11. In this instance the plan allocates a range of smaller sites with a capacity of between 10-50 dwellings although the combined capacity of these only amounts to 220 dwellings. This equates to just 1.74% of the overall need of 12,600 for the District over the plan period.
12. Finally, it is considered that the plan's reliance on delivering such a large amount of housing at such few locations is a high risk strategy, as the effect of only one of those sites failing to deliver would cause significant shortfalls in delivery.
13. In conclusion on questions 4 and 5, we consider that less reliance should be placed on large strategic sites and more emphasis should be placed on enabling smaller scale sites to come forward. This will ensure a steady and continuous supply of housing in both the short and long term and provide a contingency in the event that there are delays with the delivery of the strategic sites. We also consider that less reliance should be placed on growth at the main settlements and much greater flexibility should be built into the plan to allow housing to come forward at other settlements.
14. To address these concerns it is recommended that either:
 - a) A larger range of small to medium sized local development sites are allocated in the plan; or

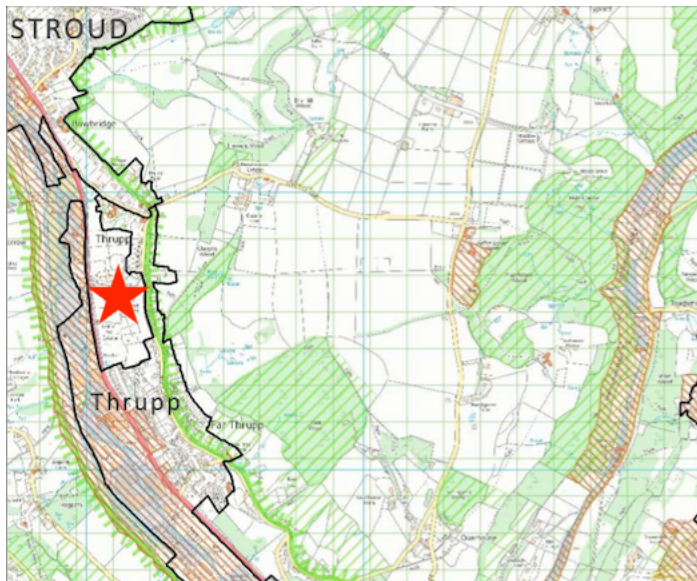
- b) The settlement hierarchy is revised so to allow proportionately scaled windfall developments to come forward on sites adjoining the Settlement Development Limits of the Districts Tier 1, 2 and 3a settlements on the basis that these represent the most sustainable and accessible locations in the District; or
 - c) Settlement Development Boundaries at Tier 1, 2 and 3a settlements should be drawn more loosely so to allow sufficient capacity for windfall developments to come forward in these locations over the plan period
- **Question 6 - Is the strategy consistent with the settlement hierarchy and is the scale of development proposed at relevant settlements justified?**

15. Our concerns in this regard relate to the strategy insofar as it relates to Brimscombe and Thrupp.
16. Core Policy CP3 outlines that Brimscombe & Thrupp is considered to be a Tier 3a settlement and is considered to be an accessible settlement with local facilities. It should be noted that Brimscombe & Thrupp has been enhanced in the settlement hierarchy from the approved Stroud District Local Plan (2015). This is by virtue of joining both settlements together to form a larger area. Given the proximity to one another, we are supportive of this approach.
17. However, we consider that the hierarchy level for Brimscombe & Thrupp as single entity has been downplayed and should be considered a Tier 2 settlement.
18. Following review of the Stroud District Settlement Role and Function Study Update 2018, which forms part of the evidence base for the plan, it is acknowledged that Brimscombe & Thrupp has some of the best accessibility to facilities and services in the District and forms a key employment role. Although, it does not have any strategic role in services or retail, given its proximity to and access to Stroud, immediately adjacent, we consider that the settlement has been disproportionately marked down in this respect.
19. We would suggest that Brimscombe & Thrupp is on a par with some of the other large settlements including Minchinhampton, Painswick and Berkeley, in terms of accessibility, services, retail and employment. For example, Painswick was upgraded from Tier 3 to Tier 2, with essentially the same settlement score. Due to this and given the proximity to Stroud, we consider that Brimscombe & Thrupp should be further upgraded to being a Tier 2 settlement.
20. In tandem with this, we consider that Brimscombe & Thrupp offers a greater potential for sustainable growth and should play an enhanced role in the plan's Spatial Strategy.
21. It is noted from the Stroud District Settlement Role and Function Study Update 2018 (Page 84) that Brimscombe & Thrupp has had an "extremely low housing growth of just 1% between 2011 and 2018 (a net increase of 13 new dwellings), which is well below the District-wide rate of growth (6%)". This is also lower than the similarly sized "large" settlements in the District, as mentioned above. This is an incredibly poor delivery given the range of facilities and services are located within or adjacent to the settlement and how accessible it is generally.
22. In addition to the concerns over the delivery of existing and allocated residential sites within Brimscombe & Thrupp, as mentioned above, it is considered that further housing allocations and/or a reassessment of the settlement boundary would be necessary in order to capitalise upon the accessibility and good levels of service provision in the locality.

- Question 20(d) - Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?

23. For the reasons set out against questions 4, 5 and 6 above, we consider that the SDL for Brimscombe and Thrupp should be expanded to enable windfall developments to come forward in what is a sustainable and accessible location for growth.
24. In particular, we express the concern that the SDL around Thrupp excludes an area between the A419 and Thrupp Road as shown with a red star on the extract from the plan's policies map at Figure 1 below.

Figure 1 – Thrupp SDL



25. This area is well related to the built up area of the settlement, is not located within the AONB and is not subject to any other designations or identified constraints. Although it has a sloping topography, this is typical of the area and is not considered to be preclusive of new development. Indeed, the part of the village immediately to the south of this area has a similarly sloping topography and contains existing development.
26. It is considered that this area could accommodate appropriately sited and designed new dwellings without adversely affecting the character or landscape setting of the settlement. Moreover, Policy HC1 of the plan provides suitable controls for preventing inappropriate forms of new development coming forward in this area and there is not considered to be any robust reasons for its exclusion. There does not appear to be anything within the evidence base for the plan that would suggest that there has been a full assessment of the Settlement Development Limit (SDL).
27. It is considered therefore that the exclusion of this area from the SDL is not justified. It is not clear what the plan is trying to achieve by excluding this area. This raises an issue of soundness as the spatial strategy for Thrupp is not sufficiently justified.

ENDS