



Kingswood Parish Council Hearing Statement

Stroud Local Plan Examination

Matter 6a – Site Allocations – General questions

February 2023

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

Issue 6 - Are the proposed housing, employment and mixed use site allocations justified, effective and consistent with national policy?

Matter 6a Site allocations - General questions

Q1. What is the purpose and status of the guiding principles for growth for each of the eight defined areas in Chapter 3 of the Plan?

KPC Response:

1. SDC will need to clarify the answer to this question however from KPC's perspective, simply providing 'guiding principles' as supporting text creates ambiguity as to the status of the text and it as a result this section of the Local Plan is not effective.
2. KPC considers that the contents of the 'guiding principles' section should be set out in the policies for each of the areas (for example The Wotton Cluster). This would allow the contents of the policy text to be fully examined and modified until it meets the tests of soundness.
3. Upon closer inspection of Chapter 3 it would appear that there are no policies in this section of the Local Plan, only Visions, Guiding Principles and Allocations for each area. This is clearly not an effective approach for a Local Plan and requires considerable modifications for it to meet the tests of soundness.
4. KPC makes the above point in principle regarding the structure of the supporting text and policies rather than responding to the content of the Wotton Cluster.

Q2. Within the Plan, what is the status of the maps and diagrams for each defined area and site allocation? Are the maps in the Plan accurately duplicating the policies map?

KPC Response:

5. The status of the maps and diagrams are unclear and this needs to be clarified by SDC.
6. We note the Inspectors' question regarding the status of the site allocations. KPC is equally as confused by the sites illustrated on the map in the Local Plan and the Policies Map. We consider this unnecessarily duplicates the Policies Map.

7. It is currently unclear what the status of the 'Development Strategy' box is. Are these boxes meant to be a policy? SDC should clarify this in the Local Plan to avoid the current confusion.

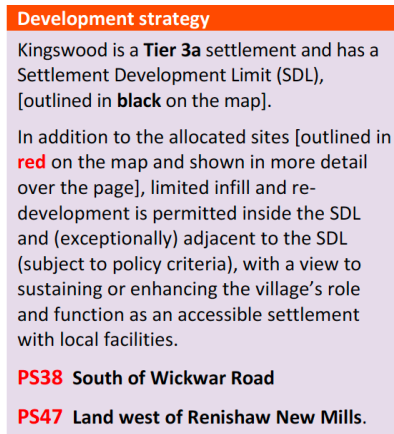


Figure 1: Draft Local Plan Page 204

- Q3. Core Policy CP5 sets out environmental development principles for strategic sites.**
- a. **How does the policy relate to the strategic site allocation policies, which specify the location of the site, the density of development and set out detailed requirements including the production of a masterplan? What are the reasons for duplicating these elements?**
 - b. **How does the policy relate to other Plan policies e.g. Core Policies DCP1 and CP14 and Delivery Policies ES1, ES2 and ES3? What are the reasons for any duplication and is this justified?**
 - c. **How will the requirements A-H in the policy be measured and how will a decision-maker know if the required statement accords with the requirements? What are the benchmarks for assessment?**
 - d. **Is it clear that the policy applies to all strategic sites set out in the Plan? Are all the requirements relevant to residential and employment strategic sites and are they justified and viable?**
 - e. **Is the policy and supporting text clear on what a Construction Environmental Management Plan would contain and how will a decision-maker determine when this would need to be produced? Is this approach justified?**
 - f. **Overall, is the policy consistent with the Framework and is it clear how it relates to national planning guidance including the National Design Guide and National Model Design Code?**

KPC Response:

8. KPC supports the principles set out in CP5 and consider they are important to ensure sustainable development on strategic sites. However, KPC does consider that SDC should make clearer in the Local Plan how these principles translate into requirements for the site allocation including those proposed in Kingswood. Currently Policy CP5 is not effective.
9. KPC would be supportive of modifications that incorporated / translated these principles into requirements for the two allocations at Kingswood which would be a sound approach particularly given that the Allocation Policies PS38 (South of Wickwar Road, Kingswood) and PS47 (Land West of Renishaw Mills) are rather limited in terms of policy requirements when viewed independently of Policy CP5.

Q4. Site allocations that include housing development specify dwelling capacity figures.

- a. **Is it clear how these have been determined for each site allocation? Are they based on the suggested yields from the SALA, or have they been updated to take account of more recent developer evidence or detailed assessments?**

KPC Response:

10. The SALA Methodology (EB18) says nothing about site capacity, density or yield so if the SALA was used to inform dwelling capacity the evidence is entirely unclear in this respect.
11. In terms of the 'development potential' for the proposed housing allocation in Kingswood, the SALA (2017)¹ for Site Ref: KIN005 Land at Cloverlea Barn states:
" This site could be developed for low density development typically comprising detached and semi - detached dwellings at an average density of 20/25 dph, and the suggested yield is 35 - 45 dwellings.
12. The assessment then indicates the 'net site area' as 2 ha and the 'net developable area' as 1.7 ha. It shows the number of houses as '45'. There is no methodology, rationale or evidence that explains how a housing capacity figure of 45 was derived. 50 dwellings on a 1.7ha site is a net density of approximately 30 dph which is at odds with the Council's assumptions / recommendations in the SALA.
13. In fact, using the Council's own 'typical density' assumption referred to above of 20/25 dph would result in a capacity figure at the low end of 34 dwellings and 42

¹ SALA 2017, Appendix 3 – Sites with Future Potential – PDF Page 80

dwellings at the upper end. Furthermore, a gross site of 2 ha with a net developable area of 1.7 ha is a 85% gross to net ratio which does not seem appropriate in this edge of village location where there are open spaces, landscape sensitives (and the need for strategic landscaping), and the need to conserve and enhance local biodiversity (biodiversity net gain). We would strongly suggest that the assumed capacity of 45 dwellings and the Policy PS38 figure of 50 dwellings are not based on evidence and need to be reduced to a range of dwellings between 34-42 dwellings.

b. Is the scale of housing for each site allocation justified having regard to any constraints and the provision of necessary additional infrastructure?

KPC Response:

14. In terms of proposed Site Allocation Policy PS38 (South of Wickwar Road, Kingswood) the policy sets out a number of constraints and additional infrastructure required which are outlined below:

- Open Space Uses
- Strategic Landscaping
- Conserving and Enhancing Local Biodiversity
- Integrating Development into the Landscape Setting
- Highway Safety Improvements to Access Services within the Village
- Retain and enhance existing trees and hedgerows
- High Quality and accessible walking and cycling routes within the site linking with and enhancing the existing network
- New Access to B4060 (Wickwar Road)
- Off-site highway improvements will be provided to facilitate safer, accessible pedestrian and cycle access to key destinations in the village.

15. In addition to these infrastructure requirements the policy fails to set out the critical infrastructure issue of school capacity which is well known and is set out in SDC's IDP² which states:

“Concerns have been raised by Gloucestershire County Council that whilst there is sufficient supply elsewhere in the Wotton Cluster, there is a lack of capacity at Kingswood Primary School due to increased demand for places from recent development. The Katherine Lady Berkeley’s School is a secondary school located between Wotton-under-Edge and Kingswood. It is predicted that this school will be overcapacity by 2021 based on forecasts within the School Places Strategy.”

² EB69 Infrastructure Delivery Plan (May 2021) Page 50

16. The Policy states that *“A Masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner”* however there is no such Masterplan or further evidence from the LPA to demonstrate how the site allocation is justified having regard to constraints and additional infrastructure.
17. The Council’s viability evidence base uses typologies so there is no viability evidence to justify its deliverability.

c. Do the site allocations achieve appropriate densities and make effective use of land, in accordance with the Framework?

KPC Response:

18. The NPPF states at Paragraph 124 that *“Planning policies and decisions should support development that makes efficient use of land, taking into account:*
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - b) local market conditions and viability;*
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - e) the importance of securing well-designed, attractive and healthy places.*
19. As already explained the proposed Site Allocation PS38 does not achieve an appropriate density and there is not the availability of capacity for infrastructure and services locally and the development will increase future car use due to its lack of sustainable transport infrastructure (lack of safe footpaths, cycle paths and poor public transport).
20. The Applicants for the site have submitted a revised layout³ for 54 dwellings which demonstrates that the proposed allocation **does not** maintain the area’s prevailing character and setting (including residential gardens). Whilst the planning application is not the subject of this Local Plan EiP it is material as it demonstrates the inappropriateness of the assumption regarding site capacity which would

³ Application Reference: S.20/0887/FUL

result in over development of the site. As one can see from the revised layout below the proposed density is entirely out of context with the surrounding properties.

21. The proposed scheme is far too compact and cramped for an edge of village location, with the open space and particularly large attenuation pond which has simply shifted to the edge rather than being integrated within the site.
22. The density is too high to support a well-designed scheme which integrates with the character of the village.



Figure 2: Application Reference S.20/0887/FUL – Revised Site Layout 06.09.2021

d. What are the reasons for using different terms for setting out the number of dwellings within each policy, such as ‘comprising’, ‘comprising up to’ and ‘comprising approximately’? Is there a particular explanation as to why some sites are restricted by an ‘up to’ number and is this approach consistent with national policy?

KPC Response:

23. For the proposed Allocation Policy PS38 it states “*comprising 50 dwellings*” yet as we have already set out this figure is not based on evidence and is excessive for this location, therefore the capacity figure should be reduced considerably if the site allocation is confirmed in principle through the Examination.

e. Overall, is the development density and capacity for each individual site justified?

KPC Response:

24. As we have already set out the density and capacity figure for Allocation Policy PS38 are entirely inappropriate and unjustified.

Q5. Many of the site allocations propose a mix of development but only the number of dwellings is specified. Where other uses such as employment are also sought, why is the size of that other use (i.e. floorspace or land area) not also specified? How will a decision-maker determine if a future development proposal meets the policy and identified needs, if the requirements are not clearly defined?

KPC Response:

25. In respect of Employment Allocation Policy PS47 (Land West of Renishaw New Mills) the policy and supporting text fails to provide any indication of the floorspace estimated or envisaged for the allocation. This will also be problematic for decision-makers to determine if future development proposals meet the policy and identified needs. Indicative employment floorspace assumptions should be set out in the policy or supporting text so that planning applications can be determined accordingly.

Q7. Which sites are located on the best and most versatile agricultural land and is the loss justified?

KPC Response:

26. The NPPF states that

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability”*

27. The NPPF defines the ‘best and most versatile agricultural land as: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

28. The Local Plan Sustainability Appraisal⁴ highlights the large area of Grade 3 Agricultural Land a significant asset to the District and highlights the pressures from development and climate change:

“The large area of Grade 3 Agricultural Land is a significant asset to the District; however pressures from development and climate change threatened the viability and productivity of such soils.”

29. According to Natural England’s Agricultural Land Classification Map (see below), the proposed allocations in Kingswood PS38 and PS47 are both located within at least Grade 3 (Good to Moderate). It appears from this map that the proposed allocation at Renishaw New Mills could partially falls under the Grade 2 (Very Good) classification. This map does not show subdivisions of Grade 3 which according to Natural England on the map “are normally mapped by more detailed survey work”.

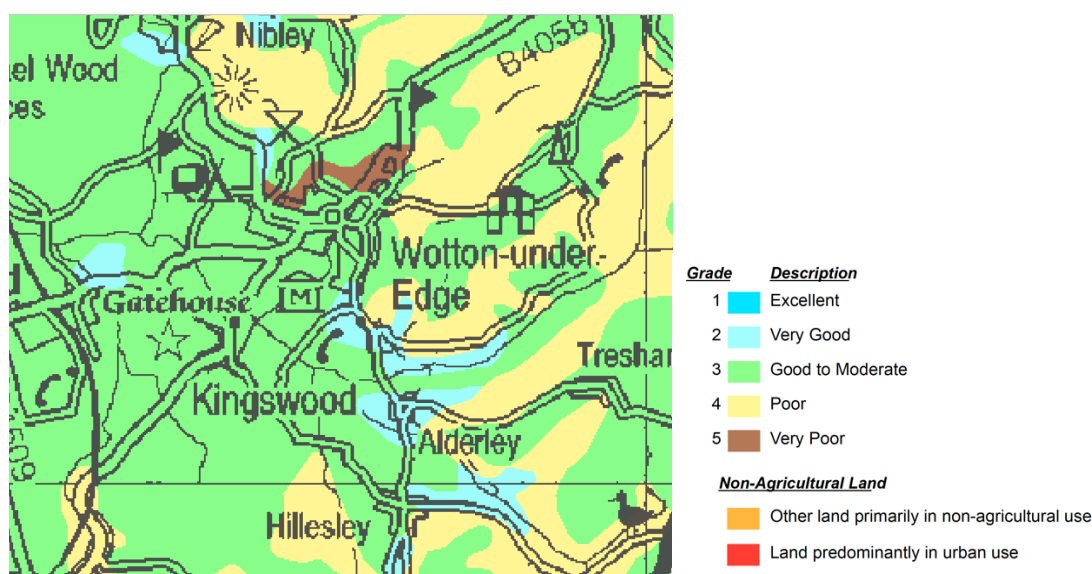
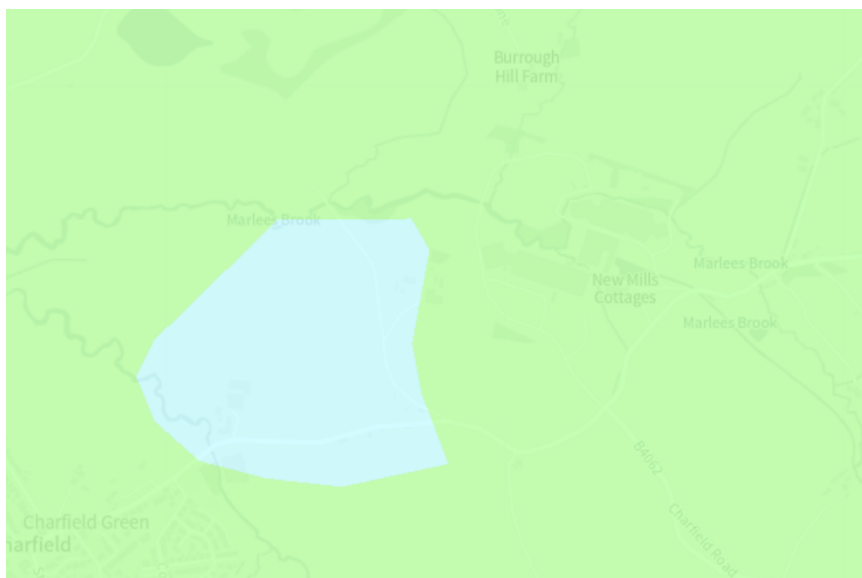


Figure 3: Natural England Agricultural Land Classification Map South West Region (ALC006)

⁴ Sustainability Appraisal Report for the Stroud District Local Plan Review – Pre-submission Draft Local Plan – Page 37



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Figure 4: Closer Image of 'Grade 2' ACL at Allocation PS47 (Renishaw New Mills)

30. Furthermore, SDC's own proposed policies would result in the proposed Allocations in Kingswood being refused due to their potential adverse impact on land quality and an unacceptable level of land pollution and loss of healthy soils in particular the best and most versatile agricultural land and economic and other benefits it offers – see Delivery Policy ES3 (Maintaining quality of life within our environmental limits).
31. The supporting text to Delivery Policy states at Paragraph 32 of the Local Plan: *“High quality agricultural land (grades 1,2 and 3a) is therefore an important resource. Once developed, even for other open space uses, the return to viable agricultural use is rarely feasible. It is important to protect, as far as practicable, the best and most versatile agricultural land from development”.*
32. Given the clear national and local policy on the protection of high quality agricultural land is very concerning that the Local Plan does not appear to have taken the quality of agricultural land into consideration in its selection and allocation of sites.

Q8. Does the Plan clearly identify which site allocations are within the SAC, SPA and Ramsar core catchment zones and have suitable assessments been carried out to identify any impacts and appropriate mitigation measures where necessary?

KPC Response:

33. It appears this is not identified in the site allocations section and clearly should be.

Q11. The Local Site Allocation Policies include an open list of ‘particular issues to address’ but these are mostly generic in nature. Limited site specific details are provided of what is required from development. Paragraph 16 of the Framework identifies that policies should be ‘clearly written and unambiguous, so it is evident how a decision-maker should react to proposals’ and should ‘serve a clear purpose, avoiding unnecessary duplication of policies’.

- a. Whilst we set out our specific questions for each site allocation below, we would like to understand why the policies are written so generally, whether the duplication of any policy wording is justified, and how this approach accords with the above national policy?**
- b. Is there sufficient detail in the supporting text to clarify what is required or should this be included in the policy?**

KPC Response:

34. KPC is in full agreement that the “particular issues are to address” set out in the Site Allocation policies are generic (not locally / site specific), ambiguous and use the word “include” which suggests that the particular issues listed are not comprehensive when in fact at this stage of the Local Plan the particular issues should for the most part be known and clearly set out.

Q13. The site allocation policies refer to the production of masterplans and/or development briefs but no further details are set out.

- a. Does the Plan clearly define what masterplans and development briefs are required to be informed by and what they need to include? Is this set out in policy?**
- b. Is it appropriate for every site allocation to require a masterplan and/or development brief, particularly the smaller sites? Is this justified and proportionate to the scale of development?**
- c. Is the process by which the masterplans and development briefs would be approved by the Council, clearly defined in the Plan? How long would this process take? Are they to be approved before decisions on planning applications are made? If so, what impact, if any, would this have on site delivery timescales?**
- d. Has the proposed delivery of each site taken appropriate account of the timescales for producing and approving masterplans and development briefs, particularly for those sites to be delivered during the first five years from adoption, and the larger or more complex sites?**

KPC Response:

35. In the case of Kingswood, KPC is very much in favour of masterplans being prepared for both of the proposed allocations and that these masterplans should be prepared at the pre-application stage through community engagement at each stage.

Q14. Has an appropriate lead-in time and delivery rate been used when determining the delivery timeframe for each site (whether residential, employment or mixed use) and is this realistic?

KPC Response:

36. In the case of Site Allocation Policy PS38 the only delivery timeframe assumptions we are aware of is the SALA pro forma which state 20 dwellings delivered in 2022/23 and 25 dwellings delivered in 2023/24. This is clearly not an accurate estimation and does not take into account the lead-in time for the Local Plan Examination, Masterplanning, Section 106 Agreement, the discharge of pre-commencement planning conditions and site preparation.

Q15. Overall, is each site allocation justified, viable and deliverable or developable (in accordance with the Framework definitions)?

KPC Response:

37. As we have set out above the proposed site allocation in Kingswood are not.

Q16. Our questions about housing supply and the trajectory as a whole are under a later matter. However, to assist us in understanding the delivery timescales for each housing site allocation, we would like the Council to provide the trajectory in a single table/spreadsheet, so that we can clearly see how many dwellings each allocated site is expected to deliver in each year of the plan period.

KPC Response:

38. This would be very useful for all participants in the Examination to have access to including KPC as this information is currently unclear to us.

END.