



FAO: Planning Strategy

Stroud District Council

By email only: [REDACTED]@stroud.gov.uk

29 January 2018

Stroud District Local Plan Review 'Emerging Strategy Paper' - Representations on Behalf of Kingswood Parish Council

Dear Stroud District Council Planning Strategy Team,

Kingswood Parish Council has instructed Troy Planning + Design to prepare representations on their behalf in relation to the Stroud District Local Plan Review - Emerging Strategy Paper, currently published for consultation.

The implications of the proposed Local Plan for the immediate parish and the wider area have been carefully considered in these representations.

The Parish Council would like to acknowledge the hard work that has gone in to preparing this Emerging Strategy Paper, which is of a high standard and is written in such a way to be clear and understandable to the reader.

Notwithstanding the commendable nature of the Plan, in summary, the Parish Council does have concerns with the emerging strategy in its current format, particularly regarding the gaps in the evidence base, the spatial strategy and the timescale and scale of growth proposed. The Parish Council has been actively engaged in the plan-making process and has engaged with the District Council on a number of occasions.

Evidence Base

The Parish Council believes that the lack of a Local Housing Needs Assessment and up to date iterations of the Infrastructure Delivery Plan and Settlement Role and Function Study greatly compromises the ability of the emerging Local Plan to put a strategy in place to plan at a district-wide level. Of particular concern for Kingswood is the lack of evidence in relation to education provision which is of importance given the existing primary provision is at capacity already.



Spatial Strategy

Relating to the aforementioned lack of an up to date Settlement Role and Function Study, the proposed settlement hierarchy is questionable in relation to a number of existing settlements. It does not appear that the proposed approach for Tier 1 to accommodate more growth than Tier 2, and Tier 2 more than Tier 3, has been followed in practice and it is a concern of the Parish Council that the role of Wotton-under-Edge in-particular will decline during the Plan period.

The Parish Council recognises the importance of meeting the needs of development up to 2040. The role Kingswood might play towards this, through identifying support for development on greenfield sites, represents a departure from the existing development plan.

We believe Stroud District Council also recognises the Parish Council's concerns that any such strategy should meet the needs for sustainable development. The preferred options identified at present do not provide certainty in terms of their capacity to improve community facilities (specifically education). This might be provided through more detail over phasing, scope for planning contributions and ensuring that sites and/or land are available to provide for these.

Kingswood is a specific example of a Parish who has contributed to the Development Plan through the preparation of its Neighbourhood Plan. Within Kingswood, and more widely, addressing outstanding questions and providing certainty over future growth should be associated with providing more power to local communities.

The Parish Council trust that the contents of these representations are taken into consideration as the Local Plan progresses through the subsequent plan-making stages.,

Yours sincerely,

[REDACTED]

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Managing Director
TROY PLANNING + DESIGN





1. Introduction

1.1 Stroud District Council adopted its current Local Plan in November 2015.

Commendably, the District Council has already begun the review process of the Local Plan, to adhere to the requirements of the National Planning Policy Framework (NPPF)¹ that a Local Plan must be reviewed every five years (paragraph 33).

1.2 The Local Plan 2015 set out the strategy for growth and development up to 2031.

The plan identified a housing target of 11,400, and having accounted for existing commitments at the time, the Plan was required to identify land for at least 3,615 dwellings. Housing allocations were proposed at the main settlements, but a settlement hierarchy was also included in the Local Plan to assist in guiding development proposed outside of site-specific allocations.

1.3 Stroud District Council has previously undertaken an Issues and Options consultation in August 2017, which provided an opportunity to discuss emerging issues and to explore the options to manage these in light of future development needs.

1.4 Stroud District Council is currently consulting on the Stroud District Local Plan Review: Emerging Strategy 2018. The purpose of this consultation is to build upon the findings from the Issues and Options consultation so that the Council can understand whether the needs of local communities have been identified and to gather an understanding of the level of support for the potential strategy.

1.5 Like many other local authorities, the housing requirement for Stroud has increased since the adoption of the current Plan and it is therefore necessary to plan for the delivery of more homes. Specifically, the requirement of new homes has increased by 40% since the Local Plan was adopted in 2015, to 638 new homes per year. Therefore, in the twenty-year plan period (2020-2040), there is the requirement for at least 12,800 homes. Existing permissions and allocations amount to 7,100 dwellings, resulting in the need to identify and allocate land for at least 5,700 homes.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf



2. The Emerging Spatial Strategy

2.1 National policy in terms of the plan-making requires that the strategy chosen can be regarded as appropriate, taking account of *reasonable alternatives* and based on the use of proportionate evidence (NPPF2018 Paragraph 35(a)). In accordance with Paragraph 32 of the NPPF this process of plan preparation should be informed throughout by the findings of a Sustainability Appraisal to consider the significant effect on social, environmental and economic objectives. Relevant and up-to-date evidence should inform each stage of plan-making (NPPF Paragraph 31).

2.2 It is the role of strategic policies to address the strategic priorities of the area. Briefly, these will address the scale, pattern and quality of development across the domains of housing; economic development; infrastructure provision; community facilities (including education); and conservation of the built and natural environment (NPPF Paragraph 20). This includes taking account of any relevant cross-boundary issues (NPPF Paragraph 21). It is also important to note that in order to secure delivery of the strategic priorities (whilst not putting the deliverability of development at risk) plans should set out the contributions expected in terms of infrastructure provision (NPPF Paragraph 34).

2.3 The emerging strategy paper for the District Local Plan Review (November 2018) expresses views on the preferred spatial strategy and is supported by a relevant Sustainability Appraisal report for this stage of plan-making (LUC, November 2018). The Council's proposed revisions to the settlement hierarchy and resulting 'preferred options' for growth arise as a result of the spatial strategy selected.

2.4 The 'Strategic Objectives' to inform the emerging strategy as part of the District Local Plan Review have been reviewed following the Issues and Options consultation. In general, these objectives are welcomed and provide a good overview of the needs for sustainable development. However, SO1 and SO1a that broadly cover the social dimension of sustainability are too narrow particularly in terms of their lack of reference to primary and secondary education.

2.5 It is also important that these objectives are tested consistently as part of the Sustainability Appraisal process to demonstrate whether they are capable of being achieved (and the outcomes in terms of significant effects) as a result of the



alternatives tested. This does not appear to be the case for the Sustainability Appraisal Objectives chosen. Objectives such as those covering 'health' (SA Objective 2) and 'vibrant communities' (SA Objective 5) appear consistent. SA Objective 6 ('services and facilities') acknowledges that some settlements and sites are not as well located in terms of access to larger settlements – this is relevant to Kingswood and should be given appropriate weight throughout but the fact it has been assessed is welcome.

2.6 However, the treatment of primary education is inconsistent and unlikely to accurately assess the outcomes for sustainable development. It is inappropriate to use SA Objective 17 ('**economic growth**') as the indicator for access to education and to base scoring solely on access to existing facilities. In terms of objectives for social sustainability capacity and opportunities for expansion are also a factor.

2.7 The spatial strategy has been assessed by looking at options and strategic issues at a range of different scales. Many of the components, including retaining a focus on different 'clusters' in the District are welcomed in carrying forward elements of the approach to the 2015 District Local Plan while seeking to meet future needs.

2.8 However, the resulting consequences for the 'Wotton Cluster' (in which Kingswood is located) and the village of Kingswood itself are potentially significant. Based on the evidence currently available we would suggest there are significant soundness concerns in terms of the justification and effectiveness of the proposed approach with particular regard to the approach at Kingswood.

2.9 There are a number of elements to these concerns expanded upon in subsequent sections and throughout the representations. They can broadly be summarised as follows with reference to the emerging strategy paper for the District Local Plan Review:

- Whilst an increase in housing need is acknowledged there is great importance in completing the **Local Housing Needs Assessment** referred to on p.16 of the strategy paper – required in accordance with Paragraph 61 of the NPPF2018 and with potentially significant impacts on requirements in different parts of the district;
- The preferred growth strategy is a '**hybrid**' that identifies some large-scale growth opportunities but introduces some scope to meet needs for



greenfield development at lower-order settlements where it is recognised there may be *more limited additional benefits* (p.29)

- The town of Wotton-under-Edge is identified as having a series of town centre and employment priorities - whilst environmental constraints are acknowledged the emerging strategy provides little clarity on the role of the settlement or supporting for future development to meet these needs
- Pursuing the strategy involves changes to the **settlement hierarchy** and specifically a 'Tier 3a' (including Kingswood) where some opportunities or scope for improvement exists - but a *2018 Settlement Role and Function Study* (p.38) apparently supporting these conclusions has not been published for comment;
- The approach means that *lesser levels of development* in some villages (including Kingswood) equates to **preferred options** identified to meet needs through greenfield development (p.32)
- There is also potential uncertainty over the scale of growth (and cumulative impact) that might actually be supported and occur, including schemes **up to 20 dwellings** adjoining settlement development limits (p.32) and some degree of greater flexibility in the **role of settlement boundaries** (p.44) [the specific text of concern to the Parish Council is discussed at paragraph 9.2 of these representations]
- The emerging preferred strategy has some regard to potential impacts of the **West of England Joint Spatial Plan** affecting growth priorities in the south of the district - no certainty is available regarding scale of growth or strategic policy solutions to infrastructure needs e.g. M5 J14 improvement;
- Finally, and following the above, significant concerns remain over the preferred options identified at Kingswood to meet the requirements for sustainable development in particular the scale and phasing of any greenfield development

2.10 The absence of the Settlement Role and Function Study 2018 (informing the proposed spatial strategy) as part of the documents published for this consultation is significant in terms of its implications for the approach proposed. On behalf of Kingswood Parish Council, we reserve the right to provide full commentary on the content of this evidence once it is available for review. We would welcome the chance to discuss findings with the local planning authority.



3. Sustainability Appraisal Findings on the Emerging Strategy

3.1 The Sustainability Appraisal is generally a robust document and it is helpful to observe that all potential reasonable alternatives to the spatial strategy as well as site-specific options have been subject to detailed testing. However, its findings indicate a number of outstanding concerns and uncertainties regarding the assumptions for the assessment and having regard to the baseline information.

3.2 Firstly, the assessment of Growth Options is helpful. The findings on Option 2 ('wider distribution') are summarised in Paragraphs 4.29 and 4.30 of the SA Report. These broadly confirm that reductions in positive effects (or some adverse effects) relate to less accessible locations and fewer opportunities to improve facilities as part of small and medium-scale schemes. However, the extent of these constraints are difficult to evaluate at District-level as some factors relate to capacity in individual settlements or arise due to the specific sites selected for development. The sites identified in Kingswood appear to represent fewer potential improvements.

3.3 One significant omission from this assessment appears to be whether any account has been taken of potential flexibility in control over development adjoining settlement limits. The suggestion on p.32 of the Council's emerging strategy that suggests support for schemes proposing 'up to 20' dwellings adjoining settlement limits does not appear to form part of the Sustainability Appraisal assumption but could have a cumulative impact on significant effects.

3.4 There is some inconsistency in terms of SA Objective 6 ('access to services') (see pp.201 of the SA Appendix) suggesting benefits to Wotton-under-Edge through wider distribution despite the lack of development proposed in the town.

3.5 Oddly, SA17 ('economic growth and education' – used to assess school provision in the site assessment) does not mention any link between the growth options and impact on provision. Where there are constraints to providing or expanding facilities (such as in Kingswood) it would be expected that a strategy of wider distribution would score fewer positive effects than through concentrated development ('Option 1'). However, Options 1 and 2 achieve the same score for objective SA17.



3.6 Specifically, in terms of the 'audit' of sites options and reasons for selecting 'preferred options' at Kingswood ('KIN A' and 'KIN B') these conclusions only explain as follows:

"The site is considered suitable and available for the scale and type of development as set out in the emerging strategy."

3.7 There is no reference to the Wotton Cluster and the findings of the assessment appear to relate largely to the sites themselves. However, as part of the reasons for rejecting other sites at Tier 3a or 3b settlements different views of the overall strategy are provided, such as for 'FRA B' (Frampton):

"this site would not accord with the emerging strategy of allocating development at the main tier 1 towns and at two new settlements, together with modest allocations at tier 2 settlements and lesser allocations at tier 3a settlements nearest to Stroud and Wotton-under-Edge."

3.8 There does not appear to be any concrete evidence for why Tier 3a settlements nearest Stroud or Wotton-under-Edge (which are respectively very different in terms of access and services) are any more suited to accommodating growth. This does not necessarily provide a reason for rejecting more sustainable options; nor has it been adequately demonstrated as part of the overall strategy as a reason for selecting 'preferred options' at Kingswood. It is far from certain that additional development in Kingswood will significantly increase the use of facilities in Wotton-under-Edge.

3.9 The South of the District is acknowledged to have greater rates of out-commuting and less access to higher-order services. Residents in the south of the District often travel to Yate, Thornbury and Chipping Sodbury, in neighbouring South Gloucestershire, for shops and in particular for supermarkets. This represents an additional challenge to maintaining sustainable patterns of travel and land use in the Wotton Cluster that would be further undermined by a dispersed pattern of growth (including greenfield allocations at Tier 3a settlements) and a failure to sustain and enhance the role of Wotton-under-Edge itself.

3.10 Therefore, whilst it is considered that the approach to setting out the preferred spatial strategy is broadly appropriate more detailed testing and consideration of



significant effects is required. This will require further recognition of constraints to growth or patterns of sustainable development (such as for the reasons highlighted as factors in Kingswood). Where this is the case it is anticipated that the reasons for selecting specific options (in terms of the scale, location and phasing of growth) may be reduced and this should be reflected in the Pre-Submission Draft of the Local Plan Review.

4. Duty to cooperate

4.1 Paragraphs 24 to 27 of the NPPF2018 deal with *maintaining effective cooperation* and expand on the Duty to Cooperate that local planning authorities are under in terms of addressing strategic matters. Collaboration, in terms of demonstrating ongoing engagement and effective outcomes on the matters to be addressed, such as where additional infrastructure provision may be required. Satisfying the Duty to Cooperate is likely to represent a component of the reasons for choosing a particular spatial strategy and the ways in which strategic priorities are addressed.

4.2 Further work on the emerging District Local Plan Review is required to further explain the impact of these priorities in relation to any proposals in Kingswood. This is acknowledged by p.35 of the 'Emerging Strategy Paper'. The lack of an up-to-date Infrastructure Delivery Plan questions whether opportunities will exist to identify and improve public transport links from Kingswood. Given the limited physical distance between Kingswood and Charfield the need to consider the potential impact and relationship of any growth at Charfield is also strategic for the purposes of national policy. Any constraints on upgrades to the M5 Junction 14 may therefore currently limit the potential for sustainable growth.

4.3 We would not anticipate any significant impact on the 'preferred' spatial strategy to meet the District's housing needs as part of considering potential unmet needs from Gloucester. However, any conclusion on sites assessed for this purpose (including their potential delivery rates and timescales) should be confirmed before deciding on appropriate changes to the settlement hierarchy within Stroud.



5. Meeting Local Housing Needs and Neighbourhood Planning

5.1 It is not the purpose of these representations to comment upon the overall figure for housing need contained within the 'Emerging Strategy Paper' for the District Local Plan Review for the period 2020-2040. As stated in the document it is trusted that Stroud District Council will keep this figure under review in-line with any revisions to the government's standard method for assessing local housing need.

5.2 However, p.16 of the consultation paper confirms that the Council is still in the process of preparing a Local Housing Need Assessment. This information is not available to inform this consultation. This is of significant importance, in accordance with Paragraph 61 of the NPPF2018, to determine the housing needs of different groups to inform planning policy (such as housing and tenure mix and the provision of specialist accommodation).

5.3 The Parish Council specifically requests that in undertaking the assessment of local housing needs regard is had to recently approved development outside but functionally related to the parish. For example, this would include the redevelopment of Pennwood Lodge Care Home (s/17/1231/FUL) (and any further accommodation for the elderly considered in future phases). This should take account of the resulting contribution towards overall housing needs (and potentially the release of existing stock onto the market).

5.4 Paragraph 65 of the NPPF2018 goes on to explain:

*"Within this overall requirement, strategic policies should also set out a **housing requirement for designated neighbourhood areas** which reflects the overall strategy for the pattern and scale of development and any relevant allocations."* (our emphasis)

5.5 The Emerging Strategy Paper contains no detail on the potential scope for neighbourhood plans to manage the location and pattern of growth in their areas. The lack of evidence to provide a housing requirement figure to designated bodies prevents opportunities for local communities to best address their contribution to the overall spatial strategy.



5.6 Section 4.3 of the consultation paper explains the role of the existing development plan in supporting those preparing neighbourhood plans to meet specific identified needs. However, the role of national policy has changed significantly. A specific concern is that without a housing requirement figure and indication of the needs of different groups it is difficult to envisage control over policies that might seek flexibility for development adjoining settlement boundaries. Notwithstanding that the Parish Council reserves judgement on such policies, the evidence base to support neighbourhood plan preparation should facilitate some control over scale, phasing and site selection through specific allocations, if appropriate.

5.7 The Parish Council notes the opportunity offered by Stroud District Council (at the 26 November 2018 workshop on the consultation proposals) in terms of collaboration between the stages of the District Local Plan Review and a review of the Kingswood Neighbourhood Plan. However, significantly greater clarity is needed in terms of the overall opportunities to manage the scale and location of development alongside the local community priorities for sustainable development. This is in addition to continuing to influence the non-strategic, detailed elements of development such as design and environmental enhancement.

6. Infrastructure

6.1 The NPPF2018 highlights the importance of the planning system in achieving sustainable development. The economic strand of sustainable development makes the specific point that there is an objective to identify and coordinate the provision of infrastructure, in order *'to support growth, innovation and improved productivity'* (para 8). Further, the NPPF identifies that strategic policies in a local plan should set out an overall strategy for, amongst other things:

- *'infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change managements, and the provision of minerals and energy (including heat)';* and
- Community facilities (such as health, education and cultural infrastructure). (para 20)

6.2 There is also the scope for non-strategic policies to be used by local authorities which can include *'allocating sites (and) the provision of infrastructure and community*



facilities at a local level' (para 28) (our emphasis).

6.3 Paragraph 34 of the NPPF states that *'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure)*.

6.4 The Issues and Options Consultation was undertaken in 2017 and asked respondents to prioritise their top five issues and challenges for the Local Plan. The current consultation includes those top five issues as key objectives for the Local Plan. The first of the Key Issues is *'Ensuring that new housing development is located in the right place, supported by the right services and infrastructure to create sustainable development'*. The suggestions put forward through the Issues and Options consultation to address this included locating development *'in areas where there is existing infrastructure, or where there is potential to improve infrastructure and public transport links'*.

6.5 Kingswood Parish Council identified in their representations² made to the Issues and Options consultation that it was imperative that the *'priorities ensure that there is adequate service provision for public transport and education'*. The Parish Council also identified this issue in their Neighbourhood Plan – namely that Kingswood Primary School is oversubscribed and that children of the houses currently under construction will have to go elsewhere for education provision.

6.6 Gloucestershire County Council has recently adopted a School Places Strategy, covering the County area. There are specific findings for the area of Wotton under Edge as a planning area, which includes Kingswood. The strategy has found that there is *'sufficient supply to meet demand and a surplus of primary places remain, with the exception of Kingswood primary*' (our emphasis).

6.7 The strategy also concludes that current forecasts for primary school places include *"approximately 24 pupils arising from developments for which S106 funding was not secured for Kingswood Primary"*.

² <https://www.stroud.gov.uk/media/640308/00133.pdf>



6.8 Kingswood Primary is operating at 97% capacity with 116 pupils on the roll in May 2018, with a total capacity of 119 pupils.

6.9 In relation to economic development, which includes accessibility to schools, the Sustainability Appraisal (2018) scored sites more favourably if they were within 800m of a primary and secondary school, and slightly less favourably if they were within 800m of either a primary or secondary school. In relation to the sites proposed in Kingswood, neither of them are within 800m of a secondary school and therefore the extent to which they can score positively against this objective is limited. However, as is clear from the School Places Strategy above, regardless of the fact that both sites are within 800m of a primary school (Kingswood Primary School), this facility does not have the capacity to accommodate more growth.

6.10 The scale of the proposed development is unlikely to produce the critical mass to warrant an additional primary school. There is evidence that the school needs to expand but there is not any space to do so due to the constraints of the existing site (of Victorian construction date, within the Kingswood Conservation Area and potentially a non-designated heritage asset in its own right). The Infrastructure Delivery Plan (IDP) appears to be the only place in the evidence base where discussion around education provision is offered. However, the IDP has a base date of 2014 and is produced with limited locationally specific findings and as such the reliability and up to date nature of the study must be questioned. There are no comments within the IDP regarding the capacity of Kingswood Primary, but as demonstrated in the School Places Strategy, there is an identified shortfall of school provision for the children emerging from new developments in Kingswood.

6.11 It is our opinion that this context presents a requirement for specific controls over the phasing and development of any greenfield development proposed so that this is associated with a strategy to ensure that sufficient school places are available within the village. Such control is unlikely to be provided solely by a requirement for development to make financial contributions towards Primary School infrastructure without a strategy for how these would be spent. This carries a particular risk for Kingswood where contributions could otherwise be used to expand schools outside the village or provide a 'transport solution' to access different Primary School catchments. Neither solution would be acceptable to the interests of sustainable development in Kingswood. Acceptable phasing controls, whilst potentially more difficult, could be associated with: confirmation of external funding sources;



confirming the transfer of land or 'land swaps' with existing playing field facilities in Kingswood; or demonstrating an ability to pool contributions from development outside Kingswood (including potentially growth in South Gloucestershire and potentially awaiting changes to current pooling restrictions). Any CIL contributions should therefore also be for the provision of a school in Kingswood; a transport solution is not sufficient.

6.12 On behalf of Kingswood Parish Council, we therefore recommend that if allocations for greenfield development are retained as part of the spatial strategy the provision of these is phased in accordance with meeting the requirement for sufficient school places.

7. Neighbourhood Plan and Sustainability

7.1 Kingswood Neighbourhood Plan was 'made' on 18th May 2017 and since that time has formed part of the development plan for the purposes of the decision-making process for applications within the Kingswood Neighbourhood Plan area. Prior to adoption, the Neighbourhood Plan was subject to an examination, with the Inspector's report³ published in January 2017. There are a number of points raised in the Inspector's report which are of importance in relation to the Stroud Local Plan Review 'Emerging Strategy Paper'.

7.2 The Inspector raised concern about continued substantial growth outside of the settlement boundary of Kingswood and the impact of this on sustainable development. The Inspector considered that in terms of social sustainability, development outside of the settlement boundary would place "*undue pressure on the social cohesion of this community*". Further, in terms of environmental sustainability, the location of Kingswood means that many residents commute by private car for quite some distance to work. The lack of public transport provision means this would likely continue and this does not adhere to the principles of environmental sustainability.

7.3 The Inspector presented further views regarding the impact on sustainability of past development in Kingswood, and explicitly stated that he is "*of the view that the*

³ <https://www.stroud.gov.uk/media/241010/kingswoodndpreportfinal.pdf>



recently permitted Chestnut Park development should be the only substantial housing development in the near future". The Inspector explained that his use of the term 'near future' is to reflect his opinion that this position may not be the case for the whole period up until 2031 and that a Local Plan review will reassess if this should still be the case. However, given that the Neighbourhood Plan was inspected just two years ago, it is unlikely that the Inspector would have considered further development permissible already. Further, in relation to Kingswood Primary School and the impact upon it from the Chestnut Park development, the Inspector also presents his view that the village school has *'insufficient places for the demand and no land on its present site for expansion'*.

7.4 Turning to specific policies within the Kingswood Neighbourhood Plan (KNP), which are in general conformity with the current District Local Plan, it is important to firstly look at Policy SL1: Kingswood Settlement Development Limits Boundary. The policy is forward thinking in nature such that it states that the settlement boundary will be as per the map included in the KNP, or any subsequent one adopted by the Local Plan. The KNP also states that development proposals outside the settlement limits boundary will not normally be permitted, subject to some specific exceptions. Therefore, the position is clear that development is unlikely to be permitted outside of the settlement limits boundary at present but with evidence and exceptions that add detail to the Local Plan.

8. Settlement Hierarchy

8.1 In the Stroud Local Plan 2015, there were five tiers to the settlement hierarchy.

Following responses to the Issues and Options Consultation for the Local Plan review, tier 3, into which Kingswood falls, was subdivided to reflect the diversity of the settlements included within that tier.

8.2 The Parish Council considers that the decision to do this has resulted in outputs that are unlikely to be as clear cut as was intended. The settlements in Tier 3a vary considerably in terms of size on the ground and their connectivity.



8.3 It is important to refer back to the Settlement Role and Function Study (2014)⁴ and look at Kingswood in comparison to other Tier 3 settlements, which have significant differences yet remain in the same Tier 3a category as Kingswood.

8.4 The Settlement Role and Function Study gives a rating level to each settlement on the basis of the provision of retail and community services and facilities. There are three settlements within Tier 3 that have a 'basic' level of "strategic" community services and facilities. It is arguable therefore how these three settlements (Manor Village, Painswick and Upton St Leonards) can be considered in the same Tier as settlements which are not considered to score at all in this category (including Kingswood). Further, in the updated hierarchy, Upton St Leonards has been placed in Tier 3b, which is lower than Kingswood, yet it has previously been agreed that this settlement shows some attributes of having a strategic level of community facilities.

8.5 It is also important to consider the ranking of settlements in relation to their size and population. Kings Stanley and Leonard Stanley (with populations in 2014 of 1,539 and 1,442, respectively) are considered as two separate settlements within Tier 3a. Due to recent development between the two settlements, it is very difficult to differentiate between the two. If one were to consider the settlement as one, then arguably it could be considered in a similar way to Berkeley (2014 population of 2,027), which is a Tier 2 settlement. This demonstrates that there is variation between settlements still in Tier 3a.

8.6 Some analysis has been undertaken to consider the distribution of sites amongst the settlement hierarchy. The allocations in and around Tier 1 settlements amount to 1,985 dwellings and those in and around Tier 2 settlements amount to only 395 dwellings. Given that those settlements graded to be in Tier 3a are the 'third choice' in terms of sustainable development, it is alarming that Tier 3a settlements are proposed to deliver 4,095 dwellings. The NPPF 2018 required strategic policies to set out a strategy for patterns of growth and the above point clearly evidences that this has not been done in a sustainable way through the Stroud Local Plan.

8.7 The specific wording of Chapter 4.2 of the Emerging Local Plan Review states that *"The strategy will concentrate housing growth at the main towns of Cam and Dursley,*

⁴ https://www.stroud.gov.uk/media/2816/final-settlement-role-and-function-study_december2014.pdf



Stonehouse and Stroud". The Plan then continues to say that "modest levels of growth will be delivered at the local service centres of Berkeley, Minchinhampton, Nailsworth and Painswick. Lesser level of growth will be delivered at the village of Brinscombe, Kings Stanley, Kingswood, Leonard Stanley, North Woodchester and Thrupp." It must be noted at this point that Wotton-under-Edge is a Tier 2 settlement yet is not included in the above text as being required to accommodate at least some level of development throughout the Plan period. Whilst it is acknowledged that there are constraints within Wotton, such as the AONB and the varying topography, it is our view that these constraints have perhaps been over-emphasised to limit any development.

8.8 Given the proposed approach to the settlement hierarchy in the emerging strategy paper it is therefore considered that use of the term '*lesser levels of growth*' is too imprecise for the purposes of developing **strategic policies** in accordance with the NPPF. In the adopted Stroud District Local Plan (2015) the same phrase has a substantially different meaning to specifically indicate settlements (including Kingswood) with no strategic requirement for greenfield development in order to meet the needs of the district over the plan period. It is a fundamental departure to use the same terminology applied to settlements where it is now suggested that allocations are required to meet the strategic needs for housing over the plan period. Furthermore, the absolute and relative level of growth anticipated at Tier 3a settlements as part of overall needs has not been quantified. This is significant particularly given there are Tier 2 settlements (such as Wotton-under-Edge) with no strategic housing allocations proposed, meaning reference to *lesser levels of growth* at smaller centres is illogical. It is requested that different terminology is used, alongside ensuring publication of an evidence for the spatial strategy that demonstrates the levels of growth anticipated are quantified, justified as appropriate, and can meet the needs for sustainable development at the locations in question.

8.9 It cannot be considered sustainable to include a settlement within Tier 2 of the settlement hierarchy and not propose any development within it to either accommodate growth in the area or to support the existing services. This will likely lead to it becoming a settlement very out of keeping with other Tier 2 settlements with the potential for the settlement role to decline. It is difficult to understand the relationship between the changes proposed in Tier 2 and Tier 3 settlements.



8.10 It is therefore unclear why Tier 3a settlements have been proposed to accommodate more development than Tier 1 or Tier 2 settlements, which are arguably the most sustainable. Furthermore, the developments proposed within Tier 3a do not appear to provide anything substantial in the way of community facilities or infrastructure. This is a considerable flaw. The lack of any infrastructure delivery alongside any proposed development would further exacerbate the less sustainable nature of these locations.

8.11 Turning to Kingswood in particular, Kingswood features in the Stroud Local Plan 2015 settlement hierarchy as a 'Third Tier' settlement. A 'Third Tier' settlement describes those settlements which are accessible but with limited facilities. The extract below is taken from the Local Plan 2015 and gives a more detailed description of third tier settlements and clearly states their limited development potential.

8.12 *"These villages possess a limited level of facilities and services that, together with improved local employment, provide the best opportunities outside the Local Service Centres for greater self-containment. They will provide for lesser levels of development in order to safeguard their role and to provide through any Neighbourhood Plans some opportunities for growth and to deliver affordable housing".*

8.13 The Inspector of the KNP stated that the recent permission of 51 dwellings at Chestnut Park provide the "lesser levels of development" as mentioned in the extract above and therefore is sufficient to successfully meet the description of a third-tier settlement. Specific weight to the findings of the 2014 Study is related to the relatively poor access to higher-order services (such as higher education and healthcare) from within the Wotton Cluster and Kingswood specifically. Stroud District Council has not currently demonstrated any evidence that this relationship with the settlement hierarchy has changed.

8.14 The Stroud District Local Plan Review proposes to split the third-tier category into Tier 3a and Tier 3b based on the concept that the villages included in the previous 'Tier 3' were too diverse with little distinction made between settlements. As discussed above, this objective has not been met and the diversity between settlements in the same tier is still present.

9. Evidence for the 'Preferred Options' in Kingswood

9.1 Sites PS38 and PS39 are both identified as potential options for residential development adjoining the settlement development limits at Kingswood. It is indicated that the spatial strategy to provide residential development at Kingswood through greenfield allocations in the Local Plan Review would be based on one or the other of these (i.e. up to 50 dwellings).

9.2 We understand that this could be in addition to any support for growth (schemes up to 20 dwellings) adjoining settlement development limits, which is presented in Chapter 4.2 which states '*Some limited development at small and medium- sized sites (up to 20 dwellings) immediately adjoining settlements development limits at Tier 1-3 settlements will be allowed, to meet specific identified local needs*'. Page 44 of the Emerging Plan details that this is considered to be a more feasible approach which will '*continue to use updated settlements development limits as the basis for all decisions, but to provide for some flexibility by allowing some limited development beyond settlement development limits*'. The potential approach lacks detail in terms of how this policy would be applied in practice (such as supporting Neighbourhood Plans to allocate sites) alongside other criteria to control unrestricted growth. Stroud District Council has not quantified the total potential amount of resulting growth. This means it is not possible to conclude that the scale of development proposed at the Preferred Options themselves would be appropriate for the village in addition to any flexibility.

9.3 We note that both sites are assessed with the same capacity for residential development. However, 'Land South of Walkmill Lane' (PS39) represents a significantly reduced proportion of the gross site area to arrive at this estimated total and this will result in the loss of employment space at Walkmill Lane, affecting the economic sustainability of the site. 'Land South of Wickwar Road' (PS38) represents a combination of two adjoining parcels to achieve the suggested total. The important feature of the development assumptions for either site is that no allowance has been made for the provision of non-residential uses such as playing fields or community facilities (in-particular Primary School). We anticipate that there would be no realistic prospect of site PS38 providing for such uses, although the



‘developable area’ of land at Walkmill Lane could be increased to provide non-residential uses subject to other considerations.

9.4 The site assessment process undertaken by Stroud District Council in the Strategic Assessment of Land Availability (SALA) (updated 2018), supported by the evidence base and Sustainability Appraisal, provides a logic for indicating these locations as ‘preferred’ against other options. This is particularly relevant in terms of landscape and heritage impacts and taking account of flood risk constraints on other sites submitted, as well as their relationship with the built settlement at the village.

9.5 Either site may therefore represent a candidate to support growth over the plan period, assuming the preferred spatial strategy identified is considered sound. However, it is apparent that further evidence is required to demonstrate that the options are acceptable.

9.6 Specifically, this relates to capacity at Kingswood Primary School and the solution to education infrastructure as well as other community facilities. In terms of the Sustainability Appraisal findings (pp.664-665 of the SA Appendix) the finding of ‘minor positive – uncertain’ effects is therefore inappropriate simply based on the proximity to existing facilities.

9.7 It also appears inconsistent that the sites have been scored differently for Sustainability Appraisal Objective 10 (‘Air Quality’) and said to achieve different outcomes in the SALA ‘Transport Accessibility Assessment’. We were unable to identify this document for public review. Whilst individual highway matters will need detailed consideration any significant barriers to access should mean the sites are excluded as reasonable alternatives. It would be expected that given the location of both sites in Kingswood other factors relating to public transport, access to other settlements and walking/cycling links would be very similar. Barriers to sustainable transport use should be acknowledged and treated equally as potentially adverse significant effects (as per the conclusions on PS38 – ‘Land South of Wickwar Road’).

9.8 In terms of Sustainability Appraisal Objective 16 (‘Employment’) the sites appear to achieve different scores because ‘Land South of Walkmill Lane’ (PS39) is in existing employment use. Adverse significant effects may arise through redevelopment for residential use. However, the sites are not significantly different and both are likely to form part of a dormitory settlement with high levels of out-commuting



(notwithstanding the role of Renishaw). Any loss of employment at PS39 may also be capable of mitigation through provision of replacement facilities or other employment-generating uses if the land is allocated, therefore the effects may be uncertain.

9.9 Other indicators in relation to the natural and historic environment appear consistently recorded, with 'Land South of Walkmill Lane' more likely to result in minor adverse effects given its proximity to both the Conservation Area and Gloucestershire Wildlife Site. Both sites will result in impacts on areas of medium landscape sensitivity. In terms of managing change the Parish Council would seek full regard to the policies and evidence base it has developed to support good design and preserve environmental character. This includes the Village Design Statement and Environmental Character Assessment as well as non-strategic policies in the Neighbourhood Plan. Before putting forward any allocations for development as part of the District Local Plan Review it is requested Stroud District Council demonstrate how this evidence has been applied in order to support the principle of development as well as the contribution of this evidence to future policy.

9.10 These representations also note the identification of a 'preferred option' location for 'a school/community uses' north of Katherine Lady Berkley School' (PS40). For the reasons set out in Section 6 of these representations (dealing with the provision of infrastructure and in-particular school places) and discussed below in relation to the suitability of site PS40, the identification of land alone does not represent a solution to the issues facing the village. It is requested that the policies of the emerging Local Plan specifically link the delivery of this site to ensure the availability of sufficient Primary School places for residents of the village. This should be treated as a prerequisite to demonstrating that greenfield development in Kingswood *may* be appropriate.

9.11 Whilst within the Parish of Wotton-under-Edge the site is functionally related to Kingswood in terms of secondary education facilities, although access for pedestrians and cyclists is sub-optimal. The emerging District Local Plan Review does not specify the type of expansion of facilities proposed or likely funding sources. However, it is considered that the land may not represent a suitable location for a replacement Primary School given its distance from the village and that the site may be required as an expansion for the secondary school. The



Sustainability Appraisal does not specify the uses assessed and it would be helpful if this could be confirmed in future work.

9.12 In conclusion, we consider that whilst the plan-making process to identify 'preferred options' is generally robust further justification is required to demonstrate an effective contribution towards sustainable development and the spatial strategy.

10. Next Steps and the Way Forward

10.1 Having regard to the points in these representations the Parish Council welcomes the opportunity to contribute to future stages of plan-making and to shape the evidence-base for the District Local Plan Review. A number of outstanding matters have been identified and are considered to require urgent attention before determining the appropriate spatial strategy and a requirement for greenfield allocations in Kingswood. These include:

- Set out a housing requirement for the neighbourhood area and a detailed understanding of housing needs;
- Ensure that the Settlement Role and Function Study 2018 is made available for comment and that it clearly indicates the re-designation of Kingswood as a 'Tier 3a' settlement, which is not currently supported by evidence;
- Clarifying the role of 'Wotton-under-Edge' in the Wotton Cluster and ensure that development sustains and enhances its role;
- Ensure that an updated Infrastructure Delivery Plan is completed, detailing the needs for Kingswood and the Wotton Cluster and specifically addressing primary education;
- Provide clarity on the future role of settlement boundaries and specifically whether support for schemes up to 20 dwellings adjoining settlement boundaries represent part of the housing requirement; and
- Clarify the strategic impacts of growth in neighbouring authorities (including those relevant to the 'South of the District')

10.2 If, following resolution of the above points, 'preferred options' for a greenfield allocation remain a component of the spatial strategy for Kingswood the evidence base for the allocation finally selected should be carefully set out. The reasons for selecting a particular site should be made clear to the local community, particularly



in terms of securing sustainable development and good design with opportunities for local policy objectives in the neighbourhood plan. Any allocation should maximise sustainable opportunities to meet the needs for community infrastructure.

10.3 Kingswood Parish Council would welcome the opportunity to meet with the District Council prior to further stages of consultation on the District Local Plan Review.