

**EXAMINATION OF THE STROUD DISTRICT LOCAL
PLAN REVIEW**

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

**MATTER 2:
Spatial Strategy and Site Selection Methodology**

On Behalf of: Redrow Homes

February 2023



Introduction

CarneySweeney has been instructed by Redrow Homes to submit a Hearing Statement in respect of Matter 2 pursuant to the Issues, Matters and Questions identified by the Local Plan Examination Inspectors in respect of Stroud District Council's Local Plan Review.

This Hearing Statement should be read alongside the representations we have previously made to the Local Plan and in particular, the representations made to the Regulation 19 Consultation (July 2021) and Technical Evidence Consultation (October 2022).



Matter 2 Spatial Strategy and site selection methodology

Issue 2 – Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives? Has the site selection process used an appropriate methodology that is based on proportionate evidence?

Vision and objectives

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

No comment at this stage – for the Council to respond.

- 2. What is the purpose of the ‘Mini Visions’ referred to in Core Policy CP4 and set out under each sub-area of the Plan? Do Maps 5-12 within the Plan reasonably reflect the spatial visions for each sub-area? Are these visions justified and do they adequately reflect the overarching Plan vision?**

It is considered that the ‘mini vision’ for the Gloucester Fringe area (Map 8) should not be focussed purely on Hunts Grove as that does not accurately reflect the development strategy for the Gloucester Fringe area. We would suggest that the mini vision should also make reference to “*promoting an inclusive community capable of providing significant community and infrastructure improvements to benefit both existing and future residents of Hardwicke*”.

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

No comment at this stage – for the Council to respond.

Spatial strategy

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

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

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



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?***

No comment at this stage – for the Council to respond.

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?***

The strategy is supported, with the exception of the two new settlements proposed at Sharpness and Wisloe. The sustainability and deliverability of each of these two new settlements is questioned.

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

No comment at this stage – for the Council to respond.

7. ***Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?***

No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

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

For the Council to clarify but it is our opinion that Policy CP2 (and by association CP3 and the Policies Maps) do not clearly define the development strategy for the District by virtue of the exclusion of the Strategic Site Allocations from the District's defined Settlement Development Limits (SDL). We would suggest that Policy CP2 and the associated Policies Map should be transparent and forward looking through the plan period rather than be used to potentially restrict development by only defining the current extent of existing settlements. The Strategic Site Allocation policies themselves can ensure that each development comes forward in a comprehensive manner in accordance with the Local Plan's development strategy, that is not the role of an SDL.



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

No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

12. **Is the use of the term ‘cumulative total’ in Core Policy CP2 clear? Or does it imply total dwellings for each settlement? Is this consistent with the site allocation policies which uses terms such as ‘approximately’ when defining dwelling numbers?**

No comment.

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

- a. **Is the approach in the policy justified and effective? Is its intention clear and is it consistent with national policy?**

The NPPF at Paragraph 16 (d) specifically outlines that plans should “*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*”. We would question whether Policy CP4 meets this test and is an effectively worded policy. Concerns are raised in respect of the policy wording including the phrase “be informed by other relevant documents”. This could imply that development proposals could have to accord with a whole suite of supplementary documents, design codes, guiding principles etc that could cause unnecessary delays and costs to a development proposal and therefore undermine its deliverability and viability. Policy CP4 should provide more certainty as to what is expected from development proposals and be less ambiguous in this regard.

- b. **Does the policy set out clear development requirements, or are these more clearly defined in other Plan policies? If so, why is there duplication?**

As above, we are concerned that Core Policy CP4, as currently worded, is vague and unspecific. We would suggest that all policies which include unnecessary repetition are removed from the Local Plan Review to ensure



that a consistent approach can be taken on the application of core and delivery policies across all development proposals.

- c. Reference is made in the policy's supporting text, at paragraph 9.22, to the National Design Guide. How does the policy relate to the updated 2021 version of this national guidance?**

No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

Settlement hierarchy

The Council has produced a Settlement Role and Function Study (2014) (EB71) and an Update (2018) (EB72) to inform the settlement hierarchy and the development strategy. The Plan sets out the settlement hierarchy in Core Policy CP3.

- 15. Core Policy CP3 states that proposals for new development should be located in accordance with the hierarchy. The Council indicates this will assist in delivering sustainable development, by concentrating growth in those settlements that already have a range of services and facilities.**

- a. Has the settlement hierarchy been derived using a robust and justified process and is it supported by credible evidence?**

Support is given, in principle, to the settlement hierarchy and concentrating growth in those settlements that already have a range of services and facilities.

A point of clarification is raised in respect of Core Policy CP3 and the associated bubble diagrams contained on pages 56 and 57 of the Local Plan which outline the types of development that would be deemed appropriate within site allocations, settlement development limits and adjoining settlement development limits.

Within Policy CP3 it is outlined that within Main Settlements (Tier 1) and Local Service Centres (Tier 2), a minimum of 2% of dwellings on strategic sites should be self-build/custom build. No such requirement is included for Tier 3 or Tier 4 Settlements. Hardwicke is classified as a Tier 3a settlement and therefore, on the basis of the wording of Policy CP3, Strategic Site G1 – Land to the South of Hardwicke should not have a requirement for self-build plots.

Policy HC3 (Self-build and custom-build housing provision) however seems to require the provision of self-build plots on strategic sites regardless of their location or settlement hierarchy which contradicts with the strategy set out in



Policy CP3.

Clarification is therefore required by the Council on whether self-build plots should be required across all strategic sites or just focussed within Tier 1 and Tier 2 settlements. Policy HC3 should be re-worded to just refer to Tier 1 and Tier 2 settlements to accord with Policy CP3.

- b. It has been suggested by representors that some settlements (including Minchinhampton, Painswick, Chalford and Kingswood) should be re-categorised within the hierarchy. Does the settlement hierarchy accurately reflect the role and function of different settlements within the District and are the settlement categorisations justified by robust and up-to-date evidence?***

No comment at this stage – for the Council to respond.

- 16. New settlements are proposed within the Plan, at Sharpness and Wisloe, but are not included in the settlement hierarchy. The approach in the Plan is to define these as settlements through a future Local Plan Review. Yet reference is made to ‘anticipated’ local centres within these settlements within Core Policy CP12.***

- a. Why are these proposed new settlements not in the hierarchy?***

No comment at this stage – for the Council to respond.

- b. If housing and employment growth will be centred at these new settlements, how will the distribution of growth in the Plan reflect the settlement hierarchy if they are not included within it?***

No comment at this stage – for the Council to respond.

- c. How will development proposals at these locations be dealt with where several policies in the Plan refer to the settlement hierarchy in their application?***

No comment at this stage – for the Council to respond.

- 17. Core Policy CP3 lists Hunts Grove as being a tier 2 local service centre (anticipated). Yet paragraph 2.9.19 states that Hunts Grove is not included within the settlement hierarchy. Can the Council clarify this and also explain why Hunts Grove is ‘anticipated’ as a tier 2 settlement?***

No comment at this stage – for the Council to respond.

- 18. Have implications of the larger strategic allocations on the existing settlements and their place within the settlement hierarchy been robustly assessed?***



No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

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

- a. Is it clear how SDL have been defined and are they justified and effective?**

For the Council to respond but we consider that the SDL's should not just be used to define the current extent of existing settlements. We continue to question why the SDL's do not include land contained within each Strategic Site Allocation for each corresponding settlement. The Strategic Site Allocation policies themselves can ensure that each development comes forward in a comprehensive manner, that is not the role of an SDL. To not include Strategic Site Allocations within the SDL could be a cause for future ambiguity over status of the allocated site boundary area and be a cause issues for sites coming forward should they be in multiple ownerships and therefore come forward in a multi-phased manner.

We would suggest that the SDL and policies map should be transparent, inclusive and forward looking through the plan period. The SDL's and Policies Maps, as currently drafted are confusing and unclear in this regard.

By not including the Strategic Allocated Sites within the Policies map appears to conflict with Paragraph 16 (b) of the NPPF as the plan is not being prepared in a positive way that is aspirational but deliverable.

- b. Are the reasons for the proposed changes to the SDL clearly explained? Do they just incorporate completed development into the settlement boundaries? Do any of the proposed changes involve land within the AONB?**

As per the comment above in respect of Question 20 (a).

- c. It appears that the SDL proposed changes do not extend to include some committed development sites currently under construction and the proposed site allocations within the Plan. Whilst some explanation has been provided in the Council's response to the representations, we remain concerned that this approach would create policy conflicts for decision-makers when determining future planning applications for these sites, as they would be outside the defined SDL. Can the Council**



provide more detailed clarification on why they consider their approach is sound?

As per the comment above in respect of Question 20 (a).

d. Are any changes to the SDL for some settlements, as suggested through the representations, necessary for soundness?

We suggest that the Strategic Site Allocations and in particular Strategic Site Allocation G1 (Land South of Hardwicke) is included within the SDL for Hardwicke to ensure that the Local Plan is seen to be sound by virtue that it has been positively prepared and justified in accordance with the tests of soundness and Paragraph 16 of the NPPF.

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

a. Is development outside the proposed SDL necessary to meet identified needs and if so, why are site allocations in these locations not being proposed or boundaries moved to accommodate this? Or will such development be ‘exception sites’?

No comment at this stage – for the Council to respond.

b. Is the Plan clear as to how decision-makers would determine whether the location of proposed development would be ‘adjacent to settlements’, ‘edge of settlements’, ‘adjoining SDL’ or ‘immediately adjoining’?

No comment at this stage – for the Council to respond.

c. Is the purpose of Figure 3 in the Plan clear? Does it form the supporting text to Core Policy CP3 or does it form part of the policy? Is it clear to developers and decision-makers as to what type and scale of development may be acceptable adjoining the SDL and when the exceptions would apply? How have these been determined and are they justified and consistent with other Plan policies e.g. affordable housing?

For the Council to consider but it is our assertion that the content of Figure 3 could be easily overlooked. Should the Figure be considered to contain policy criterion upon which the Council will base its decisions on the acceptability or the practical implications of development proposals, these should be included within the relevant section of Policy CP3 (associated within each settlement



hierarchy tier) or included as supporting text and subsequently referenced with paragraph numbers rather than being in a graphical format.

As per our response in respect of Question 15 (a), clarification is required by the Council on whether self-build plots should be required across all strategic sites or just focussed within Tier 1 and Tier 2 settlements.

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

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

No comment at this stage – for the Council to respond.

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

No comment at this stage – for the Council to respond.

23. Paragraph 2.3.12 of the Plan also sets out support for some development at tier 3b, 4a and 4b settlements of small sites up to 9 dwellings outside of defined settlement limits, provided that the policy is supported by the local community.

a. Which policy is being referenced here? Is it Core Policy CP3, Delivery Policy DHC2 or some other policy?

No comment at this stage – for the Council to respond.

b. How will the Council determine that the policy is supported by the local community? Will this be at the point of adoption? If so, what is the purpose of this supporting text?

No comment at this stage – for the Council to respond.

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

a. Why has a limit of 9 dwellings been identified for these tiers? Is this justified by robust evidence? Reference is made to the 9 dwelling limit in Figure 3 but this does not appear to form part of Core Policy CP3. Is this correct?

No comment at this stage – for the Council to respond.

b. In addition Figure 3 also states that for these tiers such development would be ‘not exceeding a 10% cumulative increase in the settlement’s



total dwellings during the Plan period'. How will this be assessed and is this approach justified? Should this be included in the policy wording or does Figure 3 form part of the policy?

No comment at this stage – for the Council to respond.

c. How does Core Policy CP3 relate to Delivery Policy DHC2? Are the policies consistent or is there unnecessary duplication and/or unclear requirements?

No comment at this stage – for the Council to respond. We would however reiterate our previous comment in respect of repetitive policies included within the Local Plan Review.

25. The text on page 23 of the Plan also states that limited housing within the AONB will be supported to meet needs arising from within the AONB.

a. Is this clearly set out in policy and if so, how will this be assessed by a decision-maker determining future planning applications?

No comment at this stage – for the Council to respond.

b. Is this approach consistent with paragraphs 176 and 177 of the Framework in regard to the AONB?

No comment at this stage – for the Council to respond.

26. Overall, is the settlement hierarchy and how it relates to the development strategy clearly explained within the Plan and is the approach justified, effective and consistent with national policy?

No comment at this stage – for the Council to respond.

Site selection methodology

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

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

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

No comment at this stage – for the Council to respond.



28. Has the site selection process been suitably informed by relevant studies/assessments and site constraints, and has it included a robust assessment of development impacts?

It should be recognised that Redrow Homes, as part of the Candidate Site process and subsequent Local Plan Review consultations, have provided the Council with a comprehensive suite of technical site specific assessments in support of the allocation of Land South of Hardwicke (Policy G1). Such assessments have included Ecology Reports, Protected Species Surveys and Reports, Flood Risk, Drainage Strategy, Services and Utilities, Landscape and Visual Assessment, Arboriculture Assessment, Heritage Assessment, Archaeological Assessments and Highways and Transportation information to inform this process. Redrow Homes also supplemented the original Candidate Site submission with a Constraints and Opportunities Plan as well as an Illustrative Masterplan to demonstrate how the site could be developed in a sustainable manner and as a positive response to the known site constraints and opportunities.

It is therefore considered that in the context of Strategic Site Allocation G1: Land to South of Hardwicke, the Council has always had the benefit of having a comprehensive up to date suite of site-specific technical assessments and evidence on which to base their assessments upon alongside their own sources of information and assessments.

The technical assessments and masterplan exercises which have been undertaken in relation to the Land South of Hardwicke have also been used to inform Redrow Homes Regulation 19 Response to the Council's Sustainability Appraisal of the site in relation to a number of set Sustainability Objectives and Scores given in both 2019 and 2021. On the whole, Redrow Homes' agreed with the Council's assessment/scores of the site, as set out by the Sustainability Appraisal. Where we did not agree with the Council's scoring, further information was provided in order to justify and evidence the newly suggested score which further reinforced Hardwicke's performance in respect of the Sustainability Objectives and Land South of Hardwicke as being an appropriate location for, and to deliver, strategic development within the Gloucester Fringe and Stroud District.

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

As per question 28.

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

As per question 28.

