

Stroud District Local Plan Review Examination

Response to Matter 2: Spatial Strategy and Site Selection Methodology

For and on behalf of: Charterhouse Strategic Land

February 2023

Introduction

1. This Hearing Statement is for and on behalf of Charterhouse Strategic Land (CSL) (representor no. 865) with respect to the Stroud District Local Plan Review (SDLPR) submitted for Examination by Stroud District Council (SDC).
2. It is concerned with **Matter 2** (Spatial Strategy and Site Selection Methodology) as set out in the Inspectors' Matters, Issues and Questions (MIQs) (Examination document reference: **ID-05**).
3. The Hearing Statement has been prepared on the basis:
 - a) that the Inspectors have received and reviewed in detail the representations previously submitted to the Stroud District Local Plan Review Pre-Submission Draft (May 2021) on behalf of CSL.
4. This Statement does not repeat previous representations, which must be read in conjunction, but makes points relevant to the Matter in question in the following sections.

Response to 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

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

5. The Vision fails to reflect the contribution that smaller settlements play in terms of the potential to provide new housing, employment opportunities and services.

Question 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?*

6. Please see CSL's response to Question 6 below.

Question 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?*

7. Strategic Objective S01 is not positively prepared as it fails to include explicit recognition of the need to meet housing needs in full in terms of quantum, choice and mix overall and for different areas of the District including for settlements such as Painswick which is identified as a Tier 2 Centre in the Cotswold Cluster (parish cluster) area. The proposed levels of housing growth for such smaller settlements are mismatched with meeting needs and current pressures.
8. The proposed levels of new housing growth for smaller settlements (including Painswick) and more rural areas as set out in Core Policies CP2 (Strategic Growth and Development Locations) or CP3 (Settlement Hierarchy) is mismatched to the aims of SO1; see CSL's separate representations concerned with those Core Policies.

Spatial Strategy

Question 4: *Is the spatial strategy justified by robust evidence and does it promote a sustainable pattern of development within the District, in accordance with paragraph 11 of the Framework? Is the Council decision as to why this development distribution option was selected, sufficiently clear?*

9. It is not at all clear how the proposed development distribution option was selected as there is not evidence in the Plan or its supporting documents as to the actual sub-district level housing, employment and service needs of settlements (including Painswick), or of the Parish Clusters. The distribution appears to be a top-down allocation to the largest centres and significant weight placed on new settlements and extensions without clear analysis of the needs and opportunities for development in other centres backed by sufficient analysis and evidence.
10. It is also not clear how the Local Plan's Strategic Objective SO1 can be effectively aligned with the development strategy and how performance of the policies in meeting this Strategic Objective will be measured.

Question 5: *Is the reliance on the delivery of most of the growth on a relatively small number of strategic development sites, including two new settlements, justified? How were the locations for the two new settlements at Sharpness and Wisloe identified and was the process robust?*

11. CSL consider that the SDLPR (particularly through Policy CP2) is over-reliant upon Strategic Sites and locations for housing and conversely fails to properly support the long-term sustainability of lower tier settlements. CP2 and paragraph 2.9.9 establishes that the proposed distribution of housing is directed mainly towards identified Strategic Sites including new settlements and extensions (representing some 78% of proposed housing supply).
12. Housing allocations in smaller settlements (called 'Local Development Sites' in Policy CP2) account for just 9.5% of the proposed supply (985 total dwellings), with windfall sites making up the balance at 12.3% (1,275 dwellings). Table 1 of CSL's representation to the Pre-Submission Plan concerning Policy CP2 sets out greater detail of the imbalance in the proposed housing supply apportionment.

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

13. CSL do not consider the strategy to be consistent with the settlement hierarchy and the scale of development proposed is not justified for relevant settlements.
14. The spatial strategy does not represent a level of growth that will support the Local Plan's 'mini-visions' for Parish Clusters (referred to in Policy CP4).
15. This is especially the case of the Cotswold Cluster which has a strategy aimed at “*protecting and enhancing all the things that will make the Cotswolds a thriving and inclusive place to live as well as a great place to visit*” (pages 211 and 212, Vision to 2040); and a driver for the Cluster (paragraph 3.8.2) to see growth that helps to meet housing needs, and maintains and improves the vitality of Painswick town centre and smaller villages supporting their ability to remain sustainable and thriving communities. In this case Policy CP2 then proposes the allocation of only one site in the Cluster at Painswick (a Tier 2 Local Service Centre) for up to 20 dwellings over the whole plan period.
16. This approach to the distribution of future housing growth is deficient and contrary to national planning policy. There should be a much enhanced role for smaller, 'Local Development Sites' in settlements such as Painswick (a Tier 2 Local Service Centre) to make a critical contribution towards meeting housing delivery requirements and ensuring an effective five-year housing land supply in addition to the contribution that Strategic Sites might make over the longer term plan period.

Question 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?*

17. Neither the Gloucestershire Local Housing Needs Assessment (September 2020) (**EB10**), or the Housing Needs and Supply Topic Paper (October 2021) (**EB8**) properly address the local level needs or supply of housing below the District-level in a manner that shows how the evidence has influenced the location of development or the overall strategy during plan-making.

18. The Local Housing Market Model (**EB99**), gives some calculation of the level and characteristics of local housing needs for the specific Parish Clusters (but not for individual settlements). However, this evidence was not available at the time the Pre-Submission SDLPR was consulted on or included in the submitted documentation for Examination and hence is concluded not to have influenced the location of development or the overall strategy during the plan-making period.
19. Looking at the Local Housing Market Model analysis for Cotswold Cluster for example, the information shows a future need for **193** dwellings (132 market and 61 affordable) but the SDLPR makes only one proposed housing allocation (site PS41, Washwell Fields) for up to **20** dwellings (and only 10 - 15 according to the SALA's assessment of the site). There is therefore a significant gap as to the specific level of local housing needs for the Cotswold Cluster in the evidence base with the proposed allocation; this is not a proactive or positively planned response to the evidence presented.
20. There is therefore no way clear demonstration that the Plan's proposed spatial growth strategy will meet local housing needs, although CSL consider that it will not.

Question 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?*

21. No. The proposed spatial strategy fails to demonstrate a commitment to the long term sustainability of key services and facilities in town centres and for smaller settlements as a whole (including for Painswick in the Cotswold Cluster). It does not adequately support the objectives supporting a prosperous rural economy (which requires strong and vital centres and smaller settlements) where the form and mix of development or proximity to essential services and facilities minimises the need to travel.
22. The spatial strategy and distribution of housing growth does not ensure that there is a sufficient choice and mix of allocated land at sustainable locations (including Painswick within the Cotswold Cluster and the AoNB) for new housing so that inclusive, balanced, sustainable communities are created and maintained and to avoid leaving existing communities to wither socially and economically.

Question 14: Overall, will the spatial strategy meet the overarching strategic objectives and achieve the Council's vision?

23. No. The spatial strategy will not meet the overarching strategic objectives or achieve the vision for the reasons set out above.

Settlement Hierarchy

Question 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?*
- 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?*

24. The process and evidence for the definition of the settlement hierarchy is for SDC to answer.
25. CSL considers that Painswick's position in the settlement hierarchy appropriately reflects the importance of the scale, role and functions of this town within the District as a sustainable location at the centre of the Cotswold Cluster providing a range of services and facilities for the town and the surrounding areas (according to the Settlement Role and Function Study Update, May 2019 – **EB72**).

Question 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?*

26. The SDL around Painswick is drawn extremely tightly and, in combination with a lack of sufficient proposed housing development sites (one site – PS41 is proposed in the SDLPR for Painswick and indeed the whole Cotswold Cluster) would result in very little housing land flexibility or resilience over the plan period. Put simply there would be no contingency or choice of potential development sites within or close to the settlement.
27. The SDL appears to have been defined based simplistically on the existing built edge of the settlement, with no evident regard to the future growth needs of Painswick or of the wider Cotswold Cluster area, or of the settled and developed character of the AoNB landscape in this location.

Question 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’?*
28. Yes development outside SDL is required in order to meet housing needs of some settlements and Parish Clusters as the SDL boundaries are drawn extremely tightly to settlements (noting the example of Painswick as set out above in response to Question 20) and there are places, such as Painswick, where the single proposed housing site allocation results in a lack of housing delivery flexibility or resilience for the Plan should the site not ultimately come forward (or deliver fewer dwellings than anticipated, noting the housing need in the Cotswold Cluster of 193 dwellings, according to the Local Housing Market Model – **EB99**).
- 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’?*

29. The variety of terms used in the SDLPR for development at the edge or beyond settlement boundaries does not aid understanding or consistency as to how the location of proposed development would be judged.
- 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?*
30. The purpose and status of Figure 3 (Our Towns and Villages Development Strategy for Tiers 1 – 4) is not clear. Neither the Policy CP3 wording or the supporting text (paragraph 2.9.14 – 2.9.19) cross-reference to Figure 3.
31. Overall Figure 3 is unnecessary. The definitive map base in accordance with the Town and Country (Local Planning) Regulations, 2012 at 9(1)(c) and (2) - and the other policies provide the objectives and directions for future growth and restraint as necessary.
32. Turning to the detail within the diagram, Figure 3 Local Service Centres (Tier 2 in Policy CP3) identifies that at least 30% affordable housing on all sites capable of providing four or more dwellings will be required in Minchinhampton, Painswick and Wotton-Under-Edge.
33. The available evidence base does not demonstrate why this is appropriate or how such a requirement would fundamentally address housing affordability or the Cotswold Cluster need for 193 dwellings (including 61 affordable units) according to **EB99**; or and the availability of affordable housing stock, especially in situations such as for Painswick where there is only a single residential development site proposed for allocation in the Plan (PS41 – Washwell Fields).

Question 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?*

34. CSL has no comment; this is for SDC to answer.

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

35. It is not clear how local needs are defined (by Cluster, Parish or settlement specific or for the Cotswolds AoNB area) or how they are evidenced here or elsewhere in the Plan. The local scale analysis of housing (and other) needs is absent from much of the SDLPR's evidence base and was only, post-submission of the Plan, addressed via the Local Housing Market Model (EB99) work.

Question 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?*

36. CSL's response to Question 22 b) above highlights the lack of evidence or clarity of housing needs arising from within the AoNB and therefore it is not clear how a decision-maker would determine future applications appropriately.

Question 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?*

37. No, for the reasons set out above and in CSL's previous submitted representations.

38. For example, the level of housing growth proposed for Painswick does not, in CSL's view, represent a sufficient quantum (a maximum of 20 dwellings – representing a growth rate of one dwelling per year over the plan period, and inconsistent with the post-submission evidence set out in EB99) capable of supporting sustainable patterns of living or addressing the demographic, economic and social challenges evident in Painswick.

39. The settlement hierarchy and spatial strategy are not aligned. There is an over-emphasis on large-scale strategic sites at the expense of securing sufficient new development (housing and employment) within other settlements, including those such as Painswick that are identified as important or key service centres and where the Plan's vision is for sustainable growth to support long term vitality and viability and social cohesion.

Question 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?*

40. CSL do not consider that the site selection process has been carried out robustly or informed by suitably detailed assessments of alternatives or of development impacts. This conclusion is reached in light of the proposed allocation of site PS41 (Washwell Fields, Painswick) and the Inspectors attention is drawn to CSL's separate response to Matter 6i (The Cotswolds Cluster Site Allocations) which sets out the details of the concerns with respect to robust assessment of impacts for that site.

Making the Plan Sound

41. The following modifications are necessary as CSL set out in its representations on the SDLPR previously:

Vision to 2040

42. A new paragraph should be added to set out an explicit statement as to the importance of supporting sufficient housing and economic growth to be directed to smaller towns and settlements in the District.

Strategic Objective SO1

43. A new bullet point should be added to SO1 to confirm that the future housing requirements of the District will be met in full to meet future needs of communities.

Spatial Strategy and Settlement Hierarchy

44. Provide:
- a) sufficient, up-to-date evidence (that should be explicitly identified in the supporting text to CP2) to confirm the deliverability and viability of proposed sites to meet the overall planned housing requirement in the context of the affordable housing need;
 - b) evidence that the identified affordable housing needs of local areas (sub-District level related to the identified Parish Clusters) can be met and are deliverable with sufficient site allocations to enable this;
 - c) up-to-date evidence (as the NPPF requires at paragraphs 60 and 61) that the total planned level and mix (size, type and tenure) of housing proposed will address evident needs including issues of unaffordability and demographic imbalances in the District and for particular sub-areas including the Cotswolds Cluster and therefore how the spatial strategy and settlement hierarchy can be aligned. A revised set of site allocations and a detailed housing trajectory should be prepared and incorporated into the SDLPR.
45. Revise Policy CP2 to provide a more balanced approach to the distribution of housing growth. This should include a greater level of housing allocated for Tier 2 settlements such as Painswick that are sustainable existing service centres and where the Plan identifies critical demographic, housing market, economic and social inclusion challenges in the Plan that future growth can address.

Figure 3

46. Delete Figure 3 from the Plan.